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Environmental Impact Report

135 Main Street Building

Final Supplemental

EE81.61

State Clearinghouse Number 81122913

Publication Date: September 3, 1982

Public Comment Period: September 3, 1982
through October 7, 1982

Public Hearing Date: October 7, 1982

Certification Date: November 30, 1982



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- Changes in the text of the Draft Supplemental EIR are indicated by solid dots at the beginning of each sentence or paragraph changed.

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I. The Purpose Of This Supplemental EIR

I. THE PURPOSE OF THIS SUPPLEMENTAL EIR

This Supplement to the Environmental Impact Report (EIR) for the 135 Main Street Building project has been prepared under an Interlocutory Order and Writ of Mandamus entered by San Francisco Superior Court Judge Daniel Weinstein in San Franciscans for Reasonable Growth v. City and County of San Francisco, Norland Properties, Real Party in Interest, Super. Ct. No. 794474. (The Superior Court's Memorandum of Interlocutory Decision and Order, Writ of Mandamus, and Interlocutory Judgment are contained in Appendix A, page 45.)

On March 25, 1982, the San Francisco City Planning Commission certified the Final EIR for the 135 Main Street Building project (Resolution No. 9356) and approved the 135 Main Street project (Resolution No. 9357). On May 17, 1982, San Franciscans for Reasonable Growth brought suit under the California Environmental Quality Act challenging the Planning Commission's action.

After trial, Judge Weinstein upheld the City Planning Commission's actions with two exceptions. First, he found that the Commission failed to explain why the EIR analyzed cumulative impacts resulting from the 2.6 million square feet of development in the approximate two-block area around the 135 Main Street project, rather than from development in the entire downtown commercial (C-3) district as was done in other EIRs certified by the City Planning Commission. Second, Judge Weinstein concluded that the Planning Commission did not adequately explain its finding that the project would not contribute to significant cumulative impacts on air quality.

Accordingly, Judge Weinstein suspended all City approvals and permits for the project,/1/ remanded the matter to the Planning Commission and ordered that the Planning Commission reconsider Resolutions 9356 and 9357.

Judge Weinstein's Order sets forth a procedure for the Planning Commission's reconsideration. First, this Supplemental EIR was to be prepared and reviewed in accordance with the California Environmental Quality Act and the State CEQA

I. The Purpose Of This Supplemental EIR

Guidelines addressing the cumulative impact and air quality issues described above./2/

Second, after completion and certification of the Final Supplemental EIR, the City Planning Commission is to reconsider the 135 Main Street project in light of the EIR and the Supplemental EIR.

Third, the City may allow any person objecting to the Planning Commission's approval or disapproval of the 135 Main Street project to appeal to the Board of Permit Appeals within 10 days after the adoption of the City Planning Commission resolution approving or disapproving the project and posting a notice of the adoption of such a resolution.

Any objection to the certification of the Supplemental EIR by the City Planning Commission must be made to Judge Weinstein within 30 days after filing of the Notice of Determination. Any other objections to any action taken by the City Planning Commission or Board of Permit Appeals in connection with the Court's order must be presented to Judge Weinstein within 15 days after the action or inaction complained of.

After this process is complete, Judge Weinstein will render a final decision in the lawsuit brought by San Franciscans for Reasonable Growth.

This Supplemental EIR contains current analyses of the cumulative effects of the proposed project under the categories of Employment, Housing, and Fiscal Factors; Transportation; Air Quality; and Energy. Under each topic discussed, those portions of the EIR which are replaced by new or updated information are identified. Additions to the EIR discussion are also noted. This report supplements or modifies the EIR published on December 18, 1981 and certified on March 25, 1982 in order to comply with the Superior Court's Order. Although not required by the Court order or CEQA, the Supplemental EIR also provides additional information for the use of the City Planning Commission.

I. The Purpose Of This Supplemental EIR

NOTES - Purpose of this Report

/1/ Except to the extent necessary for Norland Properties to complete demolition of structures on the site which were partially demolished, and to secure the site in the interest of public safety.

/2/ The public review procedures applicable to Supplemental EIRs are set forth most specifically in Sections 15067.5 and 15085(d) of the State CEQA Guidelines, (14 California Administrative Code, Sections 15067.5 and 15085(d)).

II. SUMMARY

This Supplemental EIR for the 135 Main Street project has been prepared to provide additional information as required by an Interlocutory Order and Writ of Mandamus by the San Francisco Superior Court. Included are current analyses of the cumulative effects of the proposed project and downtown office development under the categories of Employment, Housing, and Fiscal Factors; Transportation; Air Quality; and Energy.

The project would contribute approximately 260,000 gross square feet of office space to the net addition of 16.1 million gross square feet of new office construction and 0.536 million gross square feet of net new retail construction considered in the cumulative analyses. The impact of the project and cumulative office development on housing would be mitigated in part by the agreement of the project sponsor and other developers to provide units of housing under the Office Housing Production Program. Total General Fund revenues from the project would be about \$952,900.

The person trip ends during the weekday p.m. peak hour resulting from cumulative office and retail development would be approximately 48,000, of which 750 would be attributable to the project. The project would add approximately 190 p.m. peak-hour trips to Muni, which is about 1.6% of the demand resulting from cumulative development. Cumulative traffic would degrade service levels to F at the intersections of Mission Street with Main and Beale Streets near the project. The parking demand generated by the project would represent 1.6% of the total cumulative office demand.

Air quality standards would not be exceeded when the project and all cumulative development is in place. Project-related emissions would add less than 1/100 of a percent to the projected emissions in the Bay Area Air Basin. Cumulative emissions would make up less than one percent of the projected regional total in 1987. Cumulative increases in energy demand would be about five trillion Btu annually; the project would cause about one percent of this increase. Cumulative office demand would not require PG&E to alter its service plans.

III. ENVIRONMENTAL SETTING

A. CHANGED CONTEXT

Since publication of the Draft EIR on the 135 Main Street project on December 18, 1981, some changes have occurred in the physical setting of the project. The changes do not affect the basis for the original analyses, however, but are noted here as updated information.

The project site has been cleared of the two-story brick building formerly at 115 Main Street and the two-story concrete structure formerly at 135 Main Street. All of the two-story buildings bordering the site to the north and fronting on Mission Street have been vacated. These are on the site of the proposed Mission-Main Building, which is expected to be under environmental review in the last quarter of 1982. On-street parking in front of the project site is now parallel, rather than diagonal extending informally over the sidewalk. The yellow truck loading zone markings on the curb in front of the site have not been removed although the area is used for automobile parking.

Construction has just begun on two of the four buildings in Assessor's Block 3717, the 135 Main Street block, which were undergoing planning and environmental review in December 1981. This construction is at the 101 Mission Street (at Spear Street) office building site and at the Spear-Main (160 Spear Street) office building, immediately south of the project site.

The building behind the site at 150 Spear Street is nearing completion and is partially occupied by its prime tenant, the Bank of America. The Pacific Gateway Building opposite the site has been topped out and most of its exterior cladding is in place. The Federal Reserve Bank, in the block north of the site, has been fully enclosed by granite walls and glass windows while interior construction continues. In addition, an office building is under construction at 141 Steuart Street, one block east of the project block. The

III. Environmental Setting

Jewish Welfare Foundation Building at 121 Steuart Street and the 201 Spear Street Building have been approved for construction by the City. (See Table C-1, page 64.)

B. EMPLOYMENT, HOUSING, AND FISCAL FACTORS

EMPLOYMENT AND THE OFFICE SPACE MARKET

(This section replaces the second paragraph on page 28a of the EIR, and describes the building lists used in the cumulative analyses discussed in this Supplemental EIR.)

San Francisco is the major office center in the Bay Area with approximately 57.2 million gross square feet of office space (see Table B-1, Appendix B, page 59). During the 1970s, space in downtown office buildings was added at a rate of about 1.5 million square feet per year. In 1981 and 1982, the average rate of office space additions was about two million gross square feet annually. Office buildings with a total space of approximately 32.3 million square feet were constructed between 1960 and 1981.

About 7.8 million gross square feet of office space is currently under construction. About 5.4 million gross square feet has been formally approved but is not yet under construction, and an additional 4.2 million gross square feet of office space is under formal review. Together these total 17.4 million gross square feet of new office space. About 1.3 million gross square feet of existing office space has been or is proposed to be demolished to clear the sites for these office developments. This results in a net addition of 16.1 million gross square feet of new office space in Downtown San Francisco. For analysis purposes, the 16.1 million gross square feet of net new space is used, for it refers to the amount of new construction in excess of existing space on each site in terms of gross square feet of floor space. If these projects were all completed, San Francisco would have a total of approximately 73 million square feet of office space.

The above numbers and the cumulative analyses in this report are based on a list of office buildings, prepared by the Department of City Planning, which

III. Environmental Setting

on August 6, 1982 were in one of three categories: 1) under formal review by the Department of City Planning; 2) approved but not yet under construction; and 3) under construction. These buildings and the total square feet of office and retail space in each category are listed in Appendix C, Tables C-1 and C-2, pages 64 through 67./2/

The cumulative list contains only those buildings which are, or have been, formally under review by the Department of City Planning and the Department of Public Works. Not included are projects which are in an early planning stage but for which details as to types of use and floor areas of office and retail space are not available. Thus excluded are buildings in the Yerba Buena Center Redevelopment Area, Mission Bay of the Southern Pacific Land Company, the Rincon Hill-South Beach Redevelopment Area, and unfunded State and Federal office building proposals. The cumulative list does contain those office buildings in the Yerba Buena Center Redevelopment Area which are under construction or for which Land Disposition Agreements have been approved, and which have definitely identified floor area figures. The San Francisco Redevelopment Agency is currently considering a range of additional amounts of office space, but the nature and scale, including floor area, are tentative and uncertain. Therefore, potential office space in Yerba Buena Center is not included. The general basis for future development will be in accordance with the Yerba Buena Center Redevelopment Plan as amended. Hotel projects have not been included in the cumulative analyses because hotel uses have different peaking characteristics from office buildings and generally do not significantly affect peak-hour traffic or transit.

The totals indicated in Table C-2 may differ from those shown in earlier EIRs as they are based on the status of projects as of August 6, 1982. Some projects included in earlier totals have been removed from the cumulative impact analyses because they have been withdrawn from formal review or for other reasons have become inactive. On the other hand, some projects not included in earlier totals have been added to the cumulative totals because they have been activated. In sum, the lists used for the cumulative analyses in this report represent to the extent practicable the most current official record of office buildings completed, in progress, or in the review process.

III. Environmental Setting

- Vacancy Rates and Commercial Rents

- Despite an increasing office vacancy rate, the demand for office space in San Francisco is relatively strong compared with other metropolitan areas in the United States. This fact is reflected in comparatively high rents for office space and continuing low vacancy rate. Annual rents for commercial office space in the downtown area increased over 350% during the last decade, rising from about \$8.50 per square foot in 1970 to about \$30.00 per square foot in 1981./3/ Existing, converted, and rehabilitated office space located South-of-Market rents for about \$12 to \$14 per square foot; new South-of-Market office space is expected to rent for about \$23 per square foot./3/
- Based on a 1982 survey of about 300 buildings, the Building Owners and Managers Association (BOMA) of San Francisco reports a citywide office vacancy rate of 3.69%, up from 1.04% in 1981./4/ According to a June 30, 1982 report by Coldwell Banker, the downtown office vacancy rate was 3.4%, up from 0.1% during the same period in 1981./5/ The 3.4% downtown vacancy rate was among the lowest in the nation in comparison with other major downtown financial districts, and was lower than the national average of 7.0%./5/ For comparison, the June 30, 1982 downtown office vacancy rates were 6.4% in Chicago, 2.6% in downtown Manhattan, and 3.9% in Dallas./5/ The September 30, 1982 vacancy rate in Downtown San Francisco was reported as 3.7% according to Coldwell Banker./6/
- A vacancy rate of 5% is considered to be the normal rate in an active market. The low vacancy rate experienced in San Francisco indicates a continuing, strong demand for office space in San Francisco. The short-term increase in the downtown vacancy rate from 1981 to 1982 may be attributable to several factors, including an increase in the amount of available office space (due to new space being completed and space being available for sublease), a short-term decrease in the demand for office space, and the national economic recession.

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- It is difficult to forecast precisely future conditions in the market for office space. As office projects under review, approved, and under construction, totaling about 17.4 million square feet, are completed, more office space will become available. The increasing availability of downtown office space in the near future may result in a higher office vacancy rate and may lower office rents."

NOTES - Employment, Housing, and Fiscal Factors

/1/ The figure of 29 million gross square feet cited in the EIR, page 28a, was for the years 1960 through 1980. See Table B-1 of this Supplemental EIR, page 59.

/2/ Buildings on the list are located in the C-3 district, the Van Ness corridor west to the Central Freeway, the South of Market area south to the Central Freeway, Division Street, Mission Creek, and China Basin, and the northeastern waterfront below Telegraph Hill. The area is referred to as the greater Downtown area in this Supplemental EIR.

- /3/ Memorandum from Dean Macris, Director of Planning, South of Market Interim Controls, January 26, 1982.
- /4/ "Building Owners and Managers Association (BOMA) News Letter," July 8, 1982.
- /5/ Coldwell Banker, "Office Vacancy Index of the United States," June 30, 1982. San Francisco vacancy rates are part of a national survey of 24 major downtown districts conducted quarterly. A copy of the June 30, 1982 survey is on file and available for public review at the Office of Environmental Review, 450 McAllister Street, 5th Floor.
- /6/ James Ousman, Data Bank Coordinator, Coldwell Banker, telephone communication, October 26, 1982.

IV. ENVIRONMENTAL IMPACT

A. EMPLOYMENT, HOUSING, AND FISCAL FACTORS

OFFICE SPACE AND EMPLOYMENT

(This paragraph supplements, and is inserted at the end of, the discussion on page 71 of the EIR.)

The cumulative context of new office space, of which this project is a part, is described in the Setting section, Part B, page 6, and in Tables C-1 and C-2 in Appendix C, pages 64 and 67.

CUMULATIVE HOUSING

(This section supplements, and is inserted at the end of, the discussion on page 72 of the EIR.)

The relationship between downtown office growth and housing demand in San Francisco was documented in a report prepared by Recht, Hausrath and Associates, Economists, that appears as Appendix C, pages 289 through 329, of the 101 Montgomery Street EIR, certified by City Planning Commission Resolution 8941, May 7, 1981. This report is available for public review at the Office of Environmental Review, 450 McAllister Street, fifth floor, and is hereby incorporated by reference into this Supplemental EIR pursuant to Section 15149 of the California Environmental Quality Act (CEQA) guidelines. In summary, this document states that relatively high wages and employment opportunities are attracting people to San Francisco, but many people cannot afford the high housing costs in the City. The report estimated the residency patterns of new households that would be attributable to a new high-rise office building and discussed various employment growth assumptions and their housing market implications.

IV. Environmental Impact

Based on the total net new gross office space in San Francisco found in Table C-2, page 67, the project would comprise 260,500 gross square feet of new office space as part of a cumulative total of about 16.1 million gross square feet of net new office space which is now under construction, approved, or under formal review. The project would be about 1.6 percent of the total new office space.

If the assumptions used and explained in the 101 Montgomery Street EIR were applied to cumulative office development, i.e., 15 to 30 percent of the new employees generated by cumulative office development would be expected to move to San Francisco and the average household would be occupied by 1.4 downtown workers, between 6,900 and 13,800 new households attributable to new office space development would add to the housing demand in San Francisco. If the assumptions used in the formula prescribed by the Office Housing Production Program (OHPP) Interim Guidelines of January 1982 were used (i.e., 40 percent of the new employees attracted to the new jobs created would want to live in San Francisco and the average household would be occupied by 1.8 downtown workers), about 14,300 new households attributable to new office space development would add to the housing demand in San Francisco. These projections of new households are based on 16.1 million gross square feet of net new office space, which includes all projects listed in Table C-1, page 64. The employment and housing projections shown in Table B-2, page 61, exclude employees in existing buildings to be demolished on the sites of proposed buildings.

This impact on the housing market would be mitigated to a certain extent because various office developers, including Norland Properties, have agreed to provide units, through City Planning Commission final approval resolutions, or have proposed units on-site./1/ Table B-2, page 61, shows the projected effects of downtown office development on the San Francisco and regional housing markets.

Cumulative office development would increase the City's current high ratio of jobs to housing supply. Housing demand would increase in an already tight housing market. In market situations where demand outstrips supply, prices can be expected to increase. Factors independent of office development and

IV. Environmental Impact

outside the control of the City, e.g. immigration, interest rates, State and Federal tax policies, and economic trends, also influence the housing market. Quantification of the effects of cumulative office development on San Francisco housing prices is not possible.

The new demand could be accommodated through additions to the housing stock, increases in the number of office workers per household, and/or displacement of existing residents. Large additions to the San Francisco housing stock are not anticipated in the near future because the housing construction industry has declined due to high costs and interest rates. The most easily developable and available sites have already been developed. Census data indicates that the number of people per household has historically been declining. This demographic trend will probably not reverse itself in the next few years due to a variety of factors, including divorces and separations, departure of young adults from families, and the increasing proportion of elderly population. The possibility exists that gentrification -- the replacement of low-income households by more affluent ones -- could occur./2/

HOUSING AFFORDABILITY

(This section supplements the discussion of housing on page 73 of the EIR.)

A substantiated analysis of housing affordability would require, first, a determination of the number of households generated by the project which would prefer to live in San Francisco. This figure, in turn, would be related to net employment increase and residence location preference. As new office space would be primarily occupied by existing San Francisco businesses that would relocate, most new workers would be already employed in San Francisco./3/ Those project workers transferring from another place of employment within the City would not generate housing demand directly attributable to the project; thus projections of housing demand attributable to the project must subtract workers already employed in San Francisco.

New employment growth due to the project would occur as new jobs were created in older buildings that would be vacated by project employees. As tenants for

IV. Environmental Impact

the project are not known, it is impossible to predict which buildings would be vacated for the project (and which buildings would be then vacated to fill the former level of vacated space, and so on). Employee movements are dynamic; all employees who would be new to the City and attributable to the project would not be directly employed within the project. For the above reasons, it is not possible to precisely quantify new employees due to the project.

The projected regional distribution of project employees is contained in Appendix B, Table B-2, p 61. Where an employee would live is the result of individual decision-making. Such decisions are a function of location preference and housing economics. Information concerning housing preferences would be obtainable through surveys of new office workers. Preference information is complex, involving many factors such as number of bedrooms, type of neighborhood, family composition, and commute distance to work.

Assuming that the number of new employees and their preferences for housing were known, the most critical variable affecting the housing affordability analysis would be a new household's ability to pay for housing. The salary of new workers alone is insufficient to determine housing affordability; the total income of all members of a new worker's household must be known. A variety of published sources give salaries for various occupational categories, but no comprehensive data regarding the distribution of household income among office workers (or any other group of workers) exists. Citywide household income estimates based on the 1980 Census will become available during 1983, but this data source will not reflect household income of downtown office workers.

The ratio of housing expenses to income, according to the "Office/Housing Production Program (OHPP) Interim Guidelines," January 1982, is 30% of household income for rental expenses and 38% of household income for home ownership expenses. The down payment for home ownership may be assumed to be between 10% and 20% of purchase cost; however, a household's ability to afford a down payment would depend on household assets and liabilities, and would vary widely for different households. Assumptions regarding mortgage interest rates must also be made. Considering the volatility of interest rates in

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recent years, an affordability analysis based on current market interest rates might not be relevant when the project is completed and occupied.

Quantification of project impacts on the housing market is not possible based on available published information. A study of the "Feasibility of Performing a Housing Affordability Analysis" by Questor Associates (June 15, 1982) concludes that household income of project employees, distribution of housing demand, and magnitude of new demand can only be accurately determined by surveying occupants of buildings comparable to an office project. The study states that without such detailed information, "it is not feasible to quantify with reasonable accuracy the housing affordability parameters associated with new office construction"./4/

Based on available data, an approximation of a housing affordability analysis appears in Appendix B, Table B-3, page 62. Data in the table rely upon published sources of office worker incomes (not household income), and prices of housing (without regard to housing availability). Assumptions are made regarding ratio of housing expenses to income, mortgage interest rates, and down payments. Analysis based on these data and assumptions indicates that most project employees would not be able to afford ownership housing in San Francisco, although some households, depending on the number of workers per household, would be able to do so. Most project employees, except the lowest-paid clerical employees desiring to live alone, would be able to afford rental housing in San Francisco.

FISCAL EFFECTS

Revenues to the City

On August 5, 1982, the State Supreme Court ruled that increased payroll and gross receipts taxes adopted by the Board of Supervisors (Ordinances 118-80 and 119-80) but approved by less than two-thirds of the voters in San Francisco, are constitutional and not violative of California Constitution Article XIII A. (To reflect the increased General Fund revenues that would result from the project under this ruling, the last sentence of the first full paragraph on p. 74 of the EIR is replaced with the following:)

IV. Environmental Impact

Tenants of the proposed building would pay either the payroll or gross receipts tax, whichever is greater./5/ Assuming that all tenants would pay a payroll tax, a 1982 average wage of about \$25,000 for downtown office workers/6/ and a payroll tax rate of 1.5 percent, payroll tax revenues from the project would be about \$375,000.

(The third and fourth paragraphs on page 75 of the EIR are updated as follows:)

The owners of the project would pay a 0.3 percent gross receipts tax on their rental income. The estimated total annual rental income for the project would be \$7.2 million (1981 dollars). Gross receipts tax revenues therefore would be about \$21,600. There may also be an increase in the payroll taxes.

Total General Fund revenues from the non-BART sales, payroll, utility users, gross receipts, and property taxes for the City and County of San Francisco, based on the revenue calculations for the other taxes in the EIR, would be about \$952,900.

MUNI

(This discussion updates and supplements the fare and deficit information pertaining to Muni found on pages 75 and 76 of the EIR.)

The project would help pay for the Muni deficit through its contributions to the General Fund. In the 1981-82 budget, 10 percent of discretionary General Fund revenues were allocated to Muni. Based on the revised total General Fund revenues that would be generated by the project, the contribution to Muni would be about \$95,000. Based on the marginal cost figures provided by Muni, the project would more than offset the Muni deficit generated by the project through its revenue contribution to the General Fund./7/ This conclusion should be qualified because the Muni deficit-per-rider figure is based on 1980-81 data, the marginal cost is based on all rides and not peak-period riders, and the total project-related deficit is calculated using only those workers who would use Muni as their primary mode of transportation while excluding those workers who would use a combination of transportation modes, such as Muni and Southern Pacific.

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Effective April 1, 1982, the Muni fare per ride was increased from \$0.50 to \$0.60. The increase was triggered primarily to meet the fare box revenue requirements of Assembly Bill (AB) 1107. AB 1107 allows Muni to receive a portion of the one-half cent BART sales tax revenue for operating expenses provided that at least one-third of Muni's annual operating cost is paid from fare box revenues.

The San Francisco Board of Supervisors, on April 27, 1981, approved an ordinance (224-81) to assess new downtown commercial development to support Muni. The plan called for levying a one-time fee of up to \$5.00 per gross square foot upon construction of new downtown office space. The ordinance, currently in litigation, would contribute funds for maintaining and augmenting Muni transit services.

On February 1, 1982 the Board of Supervisors approved by resolution a measure declaring its intent to form a Core Area Transit Maintenance District, determining that a portion of public transit is provided Downtown in lieu of public parking places, and to impose upon real property within the area an annual payment for transit maintenance based on gross floor area. The project site is within the proposed district and would be subject to the legal assessment provisions finally adopted.

On July 12, 1982 the Board of Supervisors decided to postpone acting on the proposed transit maintenance assessment district until January 1983. This transit assessment district may no longer be applicable because the Mayor withdrew support for the measure at this time. The Board of Supervisors may consider as a substitute an increase in business taxes. The business tax increase would be in the form of a ballot measure presented to the voters; implementation would depend on voter approval (and withstanding potential legal challenges). According to a memorandum entitled "Muni's Plans to Accommodate Downtown Growth", August 5, 1982, issued by Dean Macris, Director of Planning, Muni expects to be able to meet projected cumulative demand due to downtown office development without new City taxes. According to the worst-case scenario in the memorandum, the San Francisco Municipal Railway

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Improvement Corporation, a non-profit corporation established in 1971 for the purpose of selling bonds for transit improvements, may have to raise about \$111 million through the sale of bonds over a ten-year period to finance Muni expansion.

BART

(This discussion updates the fare and deficit information found on pages 76 and 77 of the EIR.)

In 1982, the average BART operating revenue was \$1.05 per ride which was 50 percent of the average operating cost per ride./8/ If the deficit per rider would be the same in 1985 as in 1982, the project would generate a deficit of about \$78,900 per year./9/

NOTES - Employment, Housing, and Fiscal Factors

/1/ The San Francisco Office/Housing Production Program, August 19, 1982.

/2/ Report of the Citizens Housing Task Force, San Francisco, July 29, 1981 and Berkeley Planning Associates, Displacement in San Francisco, September 2, 1980.

/3/ 101 Montgomery Street EIR, EE 80.26, certified May 7, 1981.

/4/ Questor Associates, Feasibility of Performing a Housing Affordability Analysis, June 15, 1982.

/5/ Tax Collector's Office, Payroll Expense Tax and Business Tax Ordinances.

/6/ Bank of Canton Final EIR, EE 80.296, certified July 15, 1982.

/7/ Bruce Bernhard, Muni Chief Accountant, telephone communication, August 10, 1982. The average \$0.39 deficit per rider is based on 1980-81 Muni budget figures of an additional cost per ride (marginal cost) of \$0.71 and an average fare revenue per trip of \$0.32. Muni is unable to provide more recent data on cost and revenue figures per passenger. The deficit due to the project equals 1,070 employees x 29% who ride Muni x 468 rides per year x \$0.39 deficit per rider which equals \$56,636.

/8/ Sy Mober, Manager of Public Information, BART, telephone communication, August 10, 1982. This information is based on BART's 1981-82 budget and does not include the effect of a fare increase that became effective in August 1982.

/9/ 1,070 employees x 15% (who ride BART) x 468 rides per year x \$1.05 net deficit per ride = \$78,870.

B. TRANSPORTATION

TRAVEL DEMAND ANALYSIS

(This discussion and Tables 1 and 2 replace the discussion on travel demand and Tables 7, 8, and 9 on pages 79a, 80, and 81 of the EIR.)

An estimate of the amount of travel associated with the proposed project has been forecast through an aggregate travel demand modeling process using a generation/distribution/assignment model in which the project is treated as an attractor/generator of work- and nonwork-related travel in proportion to the number of square feet of office and retail space (see Appendix D for further clarification). Travel is distributed to available modes using modal split data specified by the Department of City Planning (see Table D-1, p. 71, in Appendix D)./1/

The travel from the office portion of the project has been assumed to occur at the rate of 17.5 total (57% work + 43% non-work) person trip ends (pte) per 1,000 net sq. ft. of office space. (A person trip end is a one way trip.) Travel from the retail portion of the project has been assumed to occur at 100 total pte/1,000 gross sq. ft. of retail space. Based on recent survey data, 45% of the retail travel has been assumed to be internal to the project site (i.e. already counted as part of the office travel)./2/ Accordingly, the project would generate approximately 3,860 total person trip ends per weekday. The peak hour of project generation was assumed to occur during the peak period of 4:00 to 6:00 on weekdays. Twenty percent of the daily (24-hour) office travel and 10% of the daily retail travel were assumed to occur during the p.m. peak hour. The project would generate about 750 person trip ends during the p.m. peak hour.

A total of 17.4 million gross square feet of new office space is proposed, approved or under construction in the City. Tables D-1 and D-2, in Appendix D, show the projects included in the cumulative analysis. Approximately 1.3 million gross square feet of existing office space would be

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replaced by the proposed development, resulting in about 16.1 million gross square feet of net new office space. This growth, and the 0.5 million gross square feet of net new retail construction, would generate approximately 48,000 person trip ends during the weekday p.m. peak hour.

Hotel projects have not been included in the cumulative analyses because hotel uses have different peaking characteristics from office buildings and generally do not significantly affect peak-hour traffic or transit. Residential projects have not been included because residential travel in the downtown is generally in the contra-commute direction during peak-hours and because the office trip generation rate and modal split distribution are predicated on the assumption that housing would be available in the City. Inclusion of residential projects, therefore, would result in double counting of project generated travel.

Table 1 shows estimates of future trips generated by cumulative office development in the greater downtown area. Peak-hour travel by mode for the project and other office developments is shown in Table 2. The modal assignments have been made assuming existing travel patterns and do not attempt to predict any modal shift (see Appendix D, p. 69ff for further discussion). As the bridge and freeway system serving the City is currently near capacity during peak hours, the present population of persons traveling by single-occupant automobiles might be expected to change in the future. Much of the City-wide peak-hour increase might be expected to be accommodated by a shift from single-occupant automobile to ridesharing or public transit.

In this and other San Francisco EIRs, a land-use type of approach has been used to estimate employment and the resultant transportation impacts of both the proposed project and cumulative development. An alternative type of approach is to forecast travel demand based upon regional projections of future employment (employment trend approach).^{3/} Appendix D, pages 158 to 162 contains a discussion of the differences between the two approaches.

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TABLE 1: PROJECTED PEAK-HOUR PERSON-TRIPS FOR OFFICE BUILDINGS PROPOSED, APPROVED AND UNDER CONSTRUCTION IN THE GREATER DOWNTOWN AREA AS OF AUGUST 6, 1982

<u>Buildings*</u>	<u>Office (sq. ft.)**</u>	<u>Retail (sq. ft.)**</u>	<u>Peak-Hour Person-Trips</u>
Under construction	7,427,350	136,050	21,550
Approved	4,602,600	146,310	13,690
Under Formal Review	3,801,570	249,150	12,010
135 Main Street	<u>260,000</u>	<u>4,000</u>	<u>750</u>
TOTAL	16,091,520	535,510	48,000

* All office buildings identified as of August 6, 1982 (see Table C-1 and C-2 Appendix C, pages 65ff. The 135 Main St. project has been separated from the approved project totals shown in Table C-2.

** Net new construction = Total new construction minus existing space demolished.

TABLE 2: PROJECTED PEAK-HOUR PERSON-TRIPS BY TRAVEL MODE*

<u>Modal Type</u>	<u>Projects** Under Construction</u>	<u>Approved Projects**</u>	<u>Projects Under Formal Review**</u>	<u>135 Main Project</u>	<u>Total</u>
Automobile	6,980	4,360	3,650	240	15,230
Muni	5,480	3,430	2,900	190	12,000
BART	3,700	2,310	1,950	130	8,090
A/C	1,720	1,060	880	60	3,720
SamTrans	250	160	130	10	550
SPRR	940	590	490	30	2,050
GGT	820	510	430	30	1,790
Ferry	180	100	90	10	380
Other	<u>1,480</u>	<u>1,170</u>	<u>1,490</u>	<u>50</u>	<u>4,190</u>
	21,550	13,690	12,010	750	48,000

* Projections based upon distribution shown in Table D-1, Appendix D, p. 153.

** Individual projects are listed in Table C-1, Appendix C, p. 64. The 135 Main St. project has been separated here from the approved project totals shown in Table C-2.

TRANSIT

(This discussion and Table 3 replace the discussion on transit on pages 81 and 82 of the EIR.)

The transit analysis (conducted using Department of City Planning Guidelines) analyzed cumulative and project ridership based on existing capacity. As a "worst case", this analysis assumes no expansion in the transit system and the results are not dependent on increased City, State, or Federal funding. If existing City, State, or Federal funding were to decrease, operating conditions on the Muni and other carriers would be expected to deteriorate. Conversely, if City, State, and Federal funding were to increase over existing levels, operating conditions would be expected to improve. The estimated ridership, for the 16.1 million gross square feet of net new cumulative office development and for the project, and load factors based upon existing capacity are shown in Table 3. As all of the transit agencies have five-year plans for improving service, load factors based upon capacity proposed to occur in the current five-year plan cycle (1982-1987) for each transit agency are also shown in Table 3.

The existing loads plus the project trips and cumulative trips on the 37 Muni lines with stops within 2,000 feet of the site are expected to result in about 34,300 outbound p.m. peak hour trips./4/ The project would generate approximately 190 p.m. peak-hour Muni trips. Project-generated riders during the p.m. peak hour would be about 1.6% of the demand from the 16.1 million gross square feet of net new cumulative development (see Table 2, p.19). Line by line Muni loading projections are shown in Appendix D, Table D-2, p. 74.

- The addition of the ridership from the projected 16.1 million gross square feet of net new cumulative office space and 0.5 million gross square feet of net new retail space would cause demand on most of the affected Muni lines to exceed existing capacity. This would also be the case for BART transbay, Southern Pacific and SamTrans. As the cumulative demand increases, the length of time of peak loadings would increase, spreading peak-of-the-peak conditions over time. As some lines only operate during heavy demand periods (for

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example, express service for one to two hours during peak periods), there may not be additional capacity available to allow spreading over time without adding more runs. (Additional runs may not require increases in vehicle fleet size as the additional runs would be extending the peak period level of service over a longer period of time. Additional runs would cause increases in operating and maintenance costs.)

Assuming that existing funding continues and proposed expansion occurs, the future load factors on the transit agencies would be as shown in Table 3. BART is projecting a peak hour capacity of 16,500 seats transbay (eastbound) and 11,000 seats westbay (westbound). Recommended maximum capacity would be 24,750 and 16,500 respectively. Average loadings, including ridership from the projected 16.1 million gross square feet of net new cumulative development, would not be over capacity with the anticipated five-year plan capacity. AC Transit does not have any increases proposed for its transbay service and would therefore be operating at 99% of its recommended maximum capacity with the cumulative demand. SamTrans is proposing to have a capacity of between 4,800 and 5,000 seats per hour on its San Francisco routes. Recommended maximum capacity would be 6,250 riders. Average future loadings on SamTrans would be under seated capacity when the anticipated capacity becomes available. Southern Pacific/CalTrans does not have any proposals to increase seated capacity, but station improvements, including additional parking, are proposed. Southern Pacific would therefore operate in excess of its recommended maximum capacity with the cumulative demand. Golden Gate Transit is proposing to increase peak period (6-10 a.m.) motor coach capacity by 25% over existing levels and to increase ferry service by addition of another Larkspur Ferry (an increase of about 70% over existing service). Average future loadings (including the cumulative demand) on Golden Gate Transit would not exceed capacity when the proposed additions become available./5/

TABLE 3: AFTERNOON PEAK HOUR OUTBOUND TRANSIT RIDERSHIP

Agency	RIDERSHIP				LOAD FACTOR (Existing Capacity)*			LOAD FACTOR (Proposed Capacity)**	
	● Existing (1982)+	Existing plus Cumulative	Existing plus Cumulative plus Project	Existing plus Cumulative	Existing plus Cumulative	Existing plus Cumulative plus Project	Existing plus Cumulative	Existing plus Cumulative plus Project	
Muni***	23,240	34,070	34,265	0.91	1.33	1.34	1.12	1.14	
BART									
Transbay	13,600	18,900	18,920	0.90	1.25	1.25	0.76	0.76	
Westbay	6,445	9,200	9,220	0.61	0.88	0.88	0.56	0.56	
A-C Transit	9,560	13,260	13,280	0.72	0.99	0.99	0.99	0.99	
SamTrans	1,700	2,250	2,250	0.78	1.03	1.03	0.36	0.36	
SPRR	5,180	7,220	7,230	0.78	1.10	1.10	1.10	1.10	
Golden Gate									
Motor Coach	4,510	6,290	6,300	0.66	0.92	0.92	0.73	0.73	
Ferry	800	1,180	1,180	0.39	0.57	0.57	0.57	0.33	

*Load factor based upon existing (recommended) maximum capacity. A load factor of 1.00 is equivalent to 100% of recommended seated and standing capacity being used. Recommended maximum capacity is less than "crush" loadings that occur occasionally.

** Load factor based upon proposed capacity as specified by each agency's Five-Year Plan (see Appendix D, p. 73).

*** 1982 Muni ridership is approximate based on a compilation of Muni ridership by the Department of City Planning staff. Muni data are the average of the three most recent schedule checks (observations) made by Muni for each route between August 1981 and August 1982.

+Ridership counts on BART are from March 1982; AC Transit ridership is a composite of weekdays on May 24 and 27, 1982 and June 3, 6, and 7, 1982; Golden Gate Transit ridership is for June 14, 1982; SamTrans ridership is from February 1982 and Southern Pacific-Caltrans counts are for February 25, 1982.

SOURCE: Environmental Science Associates, Inc.

TRAFFIC

(This discussion and Table 4 replace the last paragraph on page 88 of the EIR and Table 10 on page 89. Table 4 is based on current (1982) counts which are lower than those used in Table 10 of the EIR.)

Cumulative vehicular and pedestrian traffic from 16.1 million gross square feet of net new office space and 0.5 million gross square feet of net new-retail development would degrade service levels at all of the intersections shown in Table 4. After cumulative development, assuming existing traffic patterns and existing modal share relationships remain constant, the intersections at Mission-Main and Mission-Beale would be at service level F during the p.m. peak. This would occur with or without the 135 Main Street project. Operations at the Mission-Spear and Main-Howard intersections would not be reduced below Level of Service C by addition of the cumulative development or project traffic.

TABLE 4: LEVELS OF SERVICE AT INTERSECTIONS IN THE VICINITY OF 135 MAIN STREET DURING PEAK-HOURS

	MISSION- BEALE (PM)	MISSION- MAIN (AM)	MISSION- SPEAR (PM)	MAIN- HOWARD (PM)
	LOS* V/C**	LOS V/C	LOS V/C	LOS V/C
Existing (1982)+	D 0.89	D 0.85	A 0.48	C 0.74
With cumulative development***				
Without 135 Main	F 1.56	F 1.29	B 0.68	C 0.76
Cumulative development With 135 Main	F 1.60	F 1.32	B 0.68	C 0.77

*LOS stands for Level of Service which is defined in Table D-3, Appendix D, page 75.

**V/C stands for volume to capacity ratio, the use of which is explained in Appendix D, p. 75.

***The 16.1 million gross square feet of net new offices and 0.5 million gross square feet of net new retail cumulative development is listed in Table C-1, p. 64. The 135 Main Street project has been separated from the approved project totals shown in Table C-2.

+Intersection counts made by ESA on August 8, 1982 (Mission at Spear and Main at Howard), June 23, 1982 (Mission at Beale), and October 29, 1981 (Mission and Main).

PARKING

(This discussion replaces the narrative on parking on pages 89 and 90 of the EIR.)

The daily project-generated parking demand is estimated to be 275 parking spaces. This demand calculation was based on the number of work and non-work automobile trips. The average percentage of non-work trips for multi-tenanted buildings is estimated to be 43%, as assumed in the travel demand analysis. The average length of stay for non-work trips is estimated to be two hours.

To estimate the long-term parking demand by project workers, all of the work related automobile trips were assumed to generate demand for one parking space per trip, or 250 spaces for the project each day. This would be worst case because some workers would use their autos during the day thus allowing multiple use of some parking spaces. The non-work or short-term parking demand was calculated by dividing the non-work auto trips by a turnover factor based upon the average length of stay. (Turnover was calculated by dividing a 9-hour working day, 8:00 a.m. - 5:00 p.m., by the average length of stay of two hours to give a turnover factor of 4.5.) Thus the average short-term (non-work) parking demand was calculated to be 25 spaces for the project.

The project proposes to provide 22 off-street spaces. Access to the 22 off-street parking spaces in the building would be at the south end of the building on Main Street via a two-way ramp 15.5 feet wide on a 13 percent grade. The small number of spaces to be provided, in comparison with demand, is consistent with the overall policy of the Transportation Element of the Master Plan of minimizing automobile use in the core area, and the legislative policy that no parking is required by the City Planning Code (Section 161(c)) for office uses in the C-3-0 district. A six-bicycle rack would be provided in the parking area and one wide parking space adjacent to the elevators would be provided for exclusive use by handicapped individuals.

The project would have an average 25 space deficit for short-term parking. Within the near vicinity (about 1,000 feet) of the project site are approximately 2,530 commercially available off-street parking spaces. About

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470 of these spaces are located on sites of projects approved or under formal review. Average daytime occupancy in the unaffected spaces is approximately 96% with about 75 spaces open at any one time. Cumulative short-term parking demand from buildings proposed and under construction near the project (that would compete for the parking within 1,000 feet of the project) is projected to be 85 spaces. The net cumulative short-term parking deficit in the area within 1,000 feet of the project would be about 35 spaces assuming the removal of off-street parking by proposed buildings.

Using the methodology described in Appendix D, page 146, long-term parking demand for the 16.1 million gross square feet of net new cumulative office space and 0.5 million gross square feet of net new retail development in the greater downtown area has been calculated to be about 15,600 spaces (including the project). The project would represent 1.6 percent of the total demand. As long-term parking demand is typically work (employee) related and is more likely to be influenced by cost rather than by location, long-term parking demand has been assumed to be distributed over the greater downtown and South of Market areas rather than being concentrated near the proposed project location. A recent survey by the Department of City Planning shows that there are about 37,000 off-street parking spaces in the C-3 district and an additional 6,500 spaces in the area bounded by The Embarcadero, Folsom, Eighth and Bryant Streets./6/ Based upon average occupancy, about 4,100 spaces are available on a daily basis. The cumulative demand for the whole downtown area would create a theoretical net deficit of 11,500 spaces. Parking demand has been based upon existing travel patterns and is not dependent upon the availability of parking spaces or the ability of the freeway and bridge system to carry the additional demand. Freeway and bridge capacity into downtown is essentially fixed at existing levels as major construction would be required to add new capacity. Therefore, the net deficit of 11,500 spaces does not mean that 11,500 autos would be driving on City streets in search of parking. Rather, the travel demand represented by the parking deficit would most likely shift to ridesharing or transit. Increased ridesharing would not only reduce parking demand but would also reduce traffic impacts from the worst-case impacts shown in Table 4, page 25. Increased transit use would add to the demands on the regional and local transit systems, particularly Muni.

The deficit may be less than this estimate as the survey did not inventory parking in the Civic Center area, or the areas west of Eighth Street, south of Bryant Street or north of Washington Street. The survey did indicate that inside the study area about 6,000 parking spaces have been added since 1967 and approximately 1,400 are proposed to be added (exclusive of 4,845 parking spaces to be provided in Yerba Buena Center).

Current City policy, as stated in the Revisions to the Transportation Element of the Master Plan Regarding Parking, is to "Discourage the addition of new long-term parking spaces in and around downtown, limit the amount of new spaces to that which cannot reasonably be accommodated by transit and locate long-term parking facilities in areas peripheral to the downtown commercial district."/7/

The Master Plan Parking Policy has also stated the need to "encourage short-term use of existing parking facilities within and adjacent to the downtown core by converting all-day commuter parking to short-term parking in areas of high demand or to car/van pool parking where short-term parking demands are low."/7/ Accordingly, approximately 14,000 existing off-street spaces in the C-3-0 planning district could be converted to short-term-only parking if the City enacted legislation to establish public control over private garages.

Imbalances in long-term parking demand and potential supply, given projected cumulative development and demand, would be expected to encourage the use of car pools and van pools, or the creation of satellite (intercept) parking facilities in outlying non-residential areas or in outlying cities, with shuttle or expanded Muni service to the downtown area, or increased use of transit directly for commuters from San Francisco or from suburban centers (East Bay, North Bay, Peninsula). Peninsula residents, for example, could find Southern Pacific commuter trains more attractive if they could get no closer to downtown by car than the train terminal at Fourth and Townsend Streets. All transit options would add to the demands on the regional and local transit systems, however, particularly Muni.

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NOTES - Transportation

/1/ The regional distribution, office trip generation, trip purpose and peak hour percentage are from Attachment 1 of the Guidelines for Environmental Impact Review, Transportation Impacts Department of City Planning, October 1980, and the modal split assignment is from Attachment 2 supplemented by survey data collected by Environmental Science Associates, Inc.

/2/ Retail trip generation is from Trip Generation, Insititute of Transportation Engineers (ITE), 1979. Rates have been adjusted from vehicle trip ends to person trip ends based upon an assumed vehicle occupancy of 1.4 persons per vehicle. The survey of retail travel was conducted by Environmental Science Associates at Embarcadero Center on Thursday, June 17, 1982 between 10:00 a.m. and 4:00 p.m.

/3/ The Department of City Planning, Office of Environmental Review (OER), has issued a memorandum, dated July 2, 1982, dealing with the subject of the differences in the land-use and employment trend approaches, and recommending that both approaches be used in future EIRs to give a more balanced assessment of future peak transportation demand. This memorandum is on file with and available from the Office of Environmental Review, 450 McAllister St., 5th Floor. The memorandum calls out some of the fundamental differences between the two approaches and also details the limitations of each approach.

/4/ The 37 affected Muni lines are the 1, 1x, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12, 14, 14GL, 14X, 15, 17X, 21, 27, 31, 31X, 38, 38L, 38AX, 38BX, 41, 42, 45, 61, J, K, L, M, N, 71, 72, and 80X.

/5/ BART projections from Marty Birkenthal of BART on August 18, 1982; SamTrans projections from Gregory Kipp of SamTrans on August 18, 1982; A-C Transit proposals from Ted Reynolds of AC Transit on August 18, 1982; Golden Gate Transit proposals from Alan Zahradnik of Golden Gate Transit on August 19, 1982; Southern Pacific proposal from Jim Strong, Design Engineer with Southern Pacific, on August 26, 1982.

/6/ Inventory of Off-Street Parking Spaces, San Francisco Department of City Planning, May 24, 1982.

/7/ Revisions to the Transportation Element of the Master Plan Regarding Parking, Resolution 7647, San Francisco Planning Commission, January 20, 1977.

C. AIR QUALITY

(This discussion replaces Section IV G and Tables 13 and 14, pages 99 through 102, of the EIR. Table E-1 page 81, updates Table 3 on page 45 of the EIR.)

At the Beale, Main, and Spear Street intersections with Mission Street, cumulative development and project impacts on sidewalk carbon monoxide (CO) levels were calculated for 1982 and 1987, using peak-hour traffic volumes according to methods recommended by the BAAQMD./1/ The results of these calculations are shown in Table 5. Project-generated traffic would contribute less than a 0.2 parts-per-million increase to the eight-hour and one-hour carbon monoxide concentrations in the project vicinity and would cause no violations of standards.

As indicated in Table 5, no violations of standards would be expected to occur in 1987, with all planned development in place. Concentrations in 1987, with the addition of cumulative and project emissions, would be approximately the same or in most cases less than in 1982 because Federal and State-mandated vehicular emission control measures already in effect would reduce the emissions from individual vehicles,/2/ and offset emission increases caused by increases in traffic volumes. CO concentrations, as measured at the BAAQMD monitoring station at 900 23rd Street, have declined steadily since 1979, reflecting the drop in total emissions of CO that is expected to continue through the year 2000./3/

Project-related emissions would arise from project-generated transportation and from building operations (space and water heating). Emissions of carbon monoxide, hydrocarbons, and oxidants from building operations would be less than one percent of annual project-related emissions.

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TABLE 5: PROJECTED WORST-CASE CUMULATIVE SIDEWALK CARBON MONOXIDE CONCENTRATIONS AT MAJOR INTERSECTIONS NEAR THE PROJECT IN 1987* IN PARTS PER MILLION (P.P.M.)

	Existing 1982	With Cumulative Projects 1987**	With Cumulative Projects and 135 Main 1987***
1-Hour Concentration**			
Ambient level	10.3	8.4	8.4
Beale Street (south of Mission)	14.8	14.9	15.0
Main Street (south of Mission)	16.0	16.2	16.4
Mission Street (west of Spear)	15.6	13.8	13.8
8-Hour Concentration**			
Ambient level	6.5	5.2	5.2
Beale Street (south of Mission)	7.7	6.7	6.7
● Main Street (south of Mission)	8.3	7.1	7.2
● Mission Street (west of Spear)	8.8	7.1	7.1

*Concentrations at the sidewalk adjacent to the heaviest traveled roadway segment were calculated at each intersection according to the BAAQMD Guidelines for Air Quality Impact Analysis of Projects, 1975, updated with 1981 ARB EMFAC6 emission factors. These methods assume worst-case meteorology and roadway configuration. The ambient or background level in 1982 was calculated as the 3-year average of the second highest annual concentrations. For 1987, the background level was the 1982 value adjusted according to the regional emission projected for those years by the 1982 Bay Area Air Quality Plan.

**The 1-hour and 8-hour standards for carbon monoxide are 35 ppm and 9 ppm, respectively.

***The project is scheduled for completion in 1984 but calculations were done for 1987 to take into account completion of all projects currently proposed, planned or under construction (see Table C-1, page 64).

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Table 6 shows annual project-related emissions,³ development-related emissions, and regional emissions of carbon monoxide, hydrocarbons and nitrogen oxides in 1987. Project-related emissions would add less than 1/100 of a percent to the projected emissions in the San Francisco Bay Area Air Basin in 1987.

Cumulative emissions from this project and other development in the area would make up less than one percent of the regional total in 1987. Although relatively small, cumulative emissions would slightly impede attainment of air quality standards.

The project and other developments in the Downtown area would not impede the control strategies of the Bay Area Air Quality Plan.^{/2/}

NOTE - Air Quality

/1/ Bay Area Air Quality Management District, Guidelines for Air Quality Impact Analysis of Projects, 1975

/2/ Memorandum, BAAQMD, Vehicle Emission Factor Update, July 15, 1981.

/3/ABAG, BAAQMD and MTC, 1982 Bay Area Air Quality Plan, July 1982, page 59.

TABLE 6: ANNUAL PROJECT- AND CUMULATIVE DEVELOPMENT-GENERATED POLLUTANT EMISSIONS (TONS PER YEAR) IN 1987

	Project		Cumulative Development*		1982 Regional Total**	1987 Regional Total**
	Building Operation	Transportation	Building Operations	Transportation		
Carbon Monoxide	0.012	65.6	2.9	4,124	1,050,000	854,000
Hydro-carbon	0.005	5.8	1.2	363	224,000	188,000
Nitrogen Oxide	0.072	8.2	17.4	517	218,000	198,000

*Includes all buildings listed in Table C-1 at full occupancy.

**1982 Bay Area Air Quality Plan, prepared by ABAG, BAAQMD and MTC, July 1982, p. 58.

D. ENERGY

(This discussion replaces the second paragraph on page 107 of the EIR. Table 7 replaces Table 15, page 108 of the EIR.)

The project and other office development under review, approved, or under construction in downtown San Francisco (see Table C-1, page 64) would increase electricity consumption by about 260 million kilowatt-hours per year and would increase natural gas consumption by about 403 million cubic feet per year for building operations. Transportation associated with this cumulative office development would increase diesel fuel consumption by about 1.3 million gallons per year, gasoline consumption by about 8.8 million gallons per year, and electricity consumption by about 52 million kilowatt-hours per year (see Table 7). The total increase in energy demand would be about five trillion Btu/1/ annually, equivalent to about 880,000 barrels of oil per year. The project would cause about one percent of this cumulative increase.

Cumulative office development under review, approved, and under construction in downtown San Francisco, which is included in PG&E's projections /2/, would increase PG&E's current systemwide electrical load of 79,579 billion kilowatt-hours per year by about 0.3%. PG&E is planning for an 11% increase in this load by 1990; this is an average increase of about 1.2% per year./3/ Additionally, PG&E is projecting reserve margins (excess capacity) of 20 to 30 percent over the next ten years./2/ Thus, the cumulative office development would not require PG&E to alter its short-range plans.

NOTES - Energy

/1/ The British thermal unit (Btu) is a unit of heat energy equivalent to the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit at sea level.

/2/ Jim Davidson, Senior Civil Engineer, Generation Planning, Pacific Gas and Electric Company; telephone communication, May 21, 1982.

/3/ Pacific Gas and Electric Company, March, 1982, Forecast of the Demand for Electricity Within the PG&E Service Area, 1982-2002.

TABLE 7: PROJECTED ANNUAL USE OF NONRENEWABLE ENERGY RESOURCES BY 135 MAIN STREET AND CUMULATIVE DEVELOPMENT

	PROJECT			CUMULATIVE		
	Amount	Billion Btu at Source*	Percent of Project Total	Amount	Billion Btu at Source	Percent of Total
Building Operation						
Electricity	3.3 million kwh	34	54	260 million kwh	2,660	53
Natural Gas	1.2 million cu. ft	1.4	2	403 million cu. ft	440	9
Transportation						
Diesel Fuel	31,000 gal.	5	8	1,300,000 gal.	210	4
Gasoline	16,000 gal.	2.3	4	8,800,000 gal.	1,200	24
Electricity	2.0 million kwh	<u>20</u>	<u>32</u>	52 million kwh	<u>530</u>	<u>10</u>
		63	100		5,040	100

*The data in this table are rounded to two significant digits; therefore, the Btu columns do not add exactly to the totals shown.

**Cumulative figures are based on data derived from Tables C-1 and C-2, pages 65 and 68.

V. MITIGATION MEASURES WHICH WOULD MINIMIZE THE POTENTIAL IMPACTS OF THE PROJECT

The analysis of mitigation measures set forth on pages 114 through 121a of the EIR is not changed by the additional information and analysis contained in this Supplemental EIR. To the extent that the mitigation measures mitigate project impacts, they also serve, in combination with mitigation measures imposed on other projects contributing to the cumulative impacts identified, to mitigate those cumulative impacts.

TRANSPORTATION, CIRCULATION AND PARKING

(The following measures pertaining to Mission Street intersections are added at the end of page 117 of the EIR.)

The projected peak-hour level of service at the Mission-Beale intersection would be reduced to F under the cumulative development conditions. The San Francisco Department of Public Works (DPW) could mitigate this effect by prohibiting left turns from Mission St. onto Beale St. and by restriping the Beale St. approach to the intersection from four lanes to five lanes (and removing parking). These changes would change the Level of Service from F to E during the p.m. peak-hour (a volume to capacity change from 1.60 to 1.00). Implementation of such a measure would be under the jurisdiction of the DPW and would be considered as a possible mitigation measure at such time as the projected conditions develop. These changes may not be desirable as the traffic currently turning left would redistribute to other intersections, thus adding travel on the street system.

The critical approach to the Mission-Main intersection is the freeway off-ramp which currently has two lanes northbound onto Main St. and a left turn lane. The volume projected to use these lanes, including cumulative development, would decrease the level of service to F, as the projected volume would exceed the carrying capacity of the freeway off-ramp as it is currently constructed.

V. Mitigation Measures

An additional left turn lane would need to be added to increase the capacity of the off-ramp. More green time could be allocated to the appropriate phase of the traffic signal by prohibiting left turns from Mission St. onto Main St. This measure would change the Level of Service from F to E for the a.m. peak-hour (a volume to capacity change from 1.32 to 0.94). Prohibition of left turns on Mission St. would be under the jurisdiction of the DPW. Lane additions on the off-ramp would be under the jurisdiction of CalTrans.

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED
PROJECT IS IMPLEMENTED

TRANSPORTATION (CIRCULATION AND PARKING)

(This paragraph updates and replaces the first sentence of the paragraph on this subject on pages 123 and 124 of the EIR.)

The project would add directly about 190 person-trips on the Muni system during the p.m. peak hour, which would be about 1.6 percent of the demand ● resulting from the 16.1 million gross square feet of net new cumulative office space and 0.5 million gross square feet of net new retail space (described in Tables C-1 and C-2). It would add 270 trips to regional transit modes, compared with a cumulative addition of 16,580 trips.

VII. Alternatives to the Proposed Project

VII. ALTERNATIVES TO THE PROPOSED PROJECT

A. NO PROJECT

(This description updates and replaces the description of the No Project Alternative on page 125 of the EIR.)

This alternative would entail no physical change to the project site as it now exists. It would continue to be a vacant parcel enclosed by a security fence. The parcel would not provide a link needed to effectuate an interior block walkway across the site. The impacts disclosed in the EIR would not occur, and the jobs and taxes which would be generated by the project would not occur.

● G. THE PROJECT WITH NO PARKING

- (This statement is added to the description of this alternative on page 131 of the EIR.)
- "This alternative was rejected by the project sponsor because it would not substantially reduce or avoid environmental effects of the proposed project. In addition, the sponsor believes that some parking is necessary to provide service to visitors, workers, and handicapped persons who would use the building."

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VIII. Summary of Comments and Responses

A. LIST OF PERSONS COMMENTING

Sue Hestor, San Franciscans for Reasonable Growth (Oral and Written)

Sue Bierman, Member, City Planning Commission (Oral)

Darnall W. Reynolds, District CEQA Coordinator, Caltrans, District 4 (Written)

B. INTRODUCTION

As indicated in the list of commenters, Ms. Sue Hestor submitted comments orally at the hearing on the Supplemental Draft Environmental Impact Report on October 7, 1982. By letter dated October 8, 1982, Ms. Hestor supplemented her oral comments with references to documents and points referred to in the oral comments. Portions of the letter which have been included in the comments listed below and responded to are shown in brackets to distinguish them from the oral comments. The letter is included as Appendix F.

VIII. Summary of Comments and Responses

C. SUMMARY OF COMMENTS AND RESPONSES

ARCHAEOLOGY AND HISTORIC PRESERVATION

COMMENT

Sue Hestor: "This afternoon's Examiner has a story. . .that. . .the developers of the properties on this block that are currently under construction had a building condemned at 199 Mission Street on the grounds that the construction activity on that block was so endangering this brick building that it was a safety hazard. . . . How . . . could your staff, . . . not have picked up the fact that construction activity on that block was going to make uninhabitable and unsafe a building rated "1" on the architectural survey? . . . [San Francisco Examiner, October 7, 1982 - page B1 - Demolition permit ignites ruckus. Cites demolition permit for warehouse on Mission at Main. DPW cites as reason for emergency demolition permit, evading the CEQA process, the danger of the building falling down due to construction on adjacent lots. Why is that hazard omitted from the EIRs for 135 Main, 101 Mission, Spear/Main? How could the problem be so severe and not be caught already? Or is it not a hazard and just an excuse to tear down the building?]

". . . If we are going to lose landmark buildings. . . it makes a mockery of the CEQA process."

RESPONSE

The structure at 199 Mission Street was not owned by the sponsor of the 135 Main Street project. The demolition permit was granted because the building was found and declared to be structurally unsafe by the Department of Public Works. This was an inherent condition of the building at the time of inspection. The Department of Public Works did not determine that the condition was exacerbated by nearby construction./1/ The newspaper article referred to did not say that "the developers of the properties on this block that are currently under construction had a building condemned at 199 Mission Street. . . ." The article said "The building inspector said his attention was drawn to the structure by a worker engaged in pile-driving on an adjacent lot, site of the future 160 Spear Street office building." The building was given the next to lowest ratings on two generally acknowledged

ARCHAEOLOGY AND HISTORIC PRESERVATION

RESPONSE (Continued)

rating scales: "C" by Heritage (in a scale where "A" is the highest and "D" is the lowest), and "1" by the Department of City Planning survey (in a scale where 5 is the highest and 0 is the lowest). It was not under consideration or designated as a landmark building by the Landmarks Preservation Advisory Board./2/

NOTES

/1/ Don Lim, Chief Building Inspector, Department of Public Works, telephone communication, October 22, 1982.

/2/ Jonathan Malone, Secretary to the Landmarks Preservation Advisory Board, telephone communication, October 26, 1982.

COMMENT

Darnall W. Reynolds, Caltrans: "The supplemental DEIR does not address our questions on mitigation in case history archaeological material is discovered on the site. . . . Does the project proponent propose any mitigation should such remains be found?"

RESPONSE

A historical and cultural resources mitigation measure proposed as part of the project, for use in case anything of historic or archaeological value is discovered on the site, is described on page 115 of the Final EIR, certified on March 25, 1982. This mitigation measure remains a part of the project.

VIII. Summary of Comments and Responses

EMPLOYMENT, HOUSING, AND FISCAL FACTORS

Office Vacancies

COMMENT

Sue Hestor: ". . . Please explain the implications if we are . . . overbuilding, based on the recent spate of stories in the local media and now national media about office space being too expensive for the economy, too expensive for headquarters, and people starting to take second and third looks at whether they can afford to build and buy and rent that kind of space downtown.

"You have nothing in this EIR in terms of the impacts of what if we are allowing 50 percent more, 25 percent more, 100 percent more than what is going to be used? Are we going to have a midtown Manhattan situation where everyone panics because there are empty buildings? . . . I think it is a worthy topic, because you use as your overriding consideration, strengthening the downtown area. Is that strengthening the downtown area or is it weakening the downtown area by eliminating other buildings, in terms of cumulative impacts, that are much cheaper in rent, dislocating people, only to have these buildings go up and no one be in them?

[". . . Newsweek, October 11, 1982 - page 96 - Office Space Goes Begging. Cites office over-building and vacancy problems, specifically in San Francisco. Mentions problems with 353 Sacramento Street. Question raised - Is San Francisco on the verge of an office space glut because of over production and extremely high rent? What would be the consequences to the City if such were the case?"]

RESPONSE

The list of buildings included in the cumulative analysis in this report includes those which are under review and those which have been approved but are not yet under construction as well as buildings which are under construction. It can be presumed that if the market for office space were to

VIII. Summary of Comments and Responses

Office Vacancies

RESPONSE (Continued)

diminish substantially, project developers would change their development programs and postpone or cancel the construction of projects under review or recently approved. In the event of such postponement or cancellation the effects of cumulative development described in the cumulative analysis would be overstated. The vacancy rate in downtown San Francisco is among the lowest in the nation. Market forces would be expected to maintain the supply of office space in equilibrium with the demand. The following is added at the end of page 7 of the Supplemental EIR:

"Vacancy Rates and Commercial Rents

"Despite an increasing office vacancy rate, the demand for office space in San Francisco is relatively strong compared with other metropolitan areas in the United States. This fact is reflected in comparatively high rents for office space and a continuing low vacancy rate. Annual rents for commercial office space in the downtown area increased over 350% during the last decade, rising from about \$8.50 per square foot in 1970 to about \$30.00 per square foot in 1981./3/ Existing, converted, and rehabilitated office space located South-of-Market rents for about \$12 to \$14 per square foot; new South-of-Market office space is expected to rent for about \$23 per square foot./3/

"Based on a 1982 survey of about 300 buildings, the Building Owners and Managers Association (BOMA) of San Francisco reports a citywide office vacancy rate of 3.69%, up from 1.04% in 1981./4/ According to a June 30, 1982 report by Coldwell Banker, the downtown office vacancy rate was 3.4%, up from 0.1% during the same period in 1981./5/ The 3.4% downtown vacancy rate was among the lowest in the nation in comparison with other major downtown financial districts, and was lower than the national average of 7.0%./5/ For comparison, the June 30, 1982 downtown office vacancy rates were 6.4% in Chicago, 2.6% in downtown Manhattan, and 3.9% in Dallas./5/ The September 30, 1982 vacancy rate in Downtown San Francisco was reported as 3.7% according to Coldwell Banker./6/

Office Vacancies

RESPONSE (Continued)

"A vacancy rate of 5% is considered to be the normal rate in an active market. The low vacancy rate experienced in San Francisco indicates a continuing, strong demand for office space in San Francisco. The short-term increase in the downtown vacancy rate from 1981 to 1982 may be attributable to several factors, including an increase in the amount of available office space (due to new space being completed and space being available for sublease), a short-term decrease in the demand for office space, and the national economic recession.

"It is difficult to forecast precisely future conditions in the market for office space. As office projects under review, approved, and under construction, totaling about 17.4 million square feet, are completed, more office space will become available. The increasing availability of downtown office space in the near future may result in a higher office vacancy rate and may lower office rents."

The following footnotes are added beginning on page 8 of the EIR:

/3/ Memorandum from Dean Macris, Director of Planning, South of Market Interim Controls, January 26, 1982.

/4/ "Building Owners and Managers Association (BOMA) News Letter," July 8, 1982.

/5/ Coldwell Banker, "Office Vacancy Index of the United States," June 30, 1982. San Francisco vacancy rates are part of a national survey of 24 major downtown districts conducted quarterly. A copy of the June 30, 1982 survey is on file and available for public review at the Office of Environmental Review, 450 McAllister Street, 5th Floor.

/6/ James Ousman, Data Bank Coordinator, Coldwell Banker, telephone communication, October 26, 1982."

VIII. Summary of Comments and Responses

Regional Housing

COMMENT

Sue Hestor: ". . . on Page 61, this table, which is projected effects of downtown office development on regional housing markets, is a myopic picture of the housing market in the region. It does not factor in how much demand is being put on the regional housing market by places other than San Francisco. . . . You need to correlate the problem in terms of housing demand with the range of commute and the environmental effects. . . . The environmental effects, when you go beyond the range of the transit systems, are qualitatively different. Because people that have no transit are going to drive, and problems are going to get worse. Even though you say the bridge is at capacity, we'll just be at capacity twice as long every day. . . .

"And in the private sector, give us the figure from 1960 to 1981 on how much housing in the region increased by rental housing, by private, single-family homes, and where that occurred. How much increased capacity occurred in San Francisco? How much occurred in all of the surrounding counties.?" . . . Is the housing supply going to expand regionally to meet the demand that San Francisco and the other counties are going to put on it? And where is that housing going to be? . . . And what transit is there to move them?"

RESPONSE

As noted by the commenter, Table B-2 on page 143 of the Final Supplemental EIR does not project regional housing demand from sources other than downtown San Francisco office development. Regional housing demand is attributable to many factors, including regional employment growth, children reaching maturity, divorces and separations, and Bay Area immigration that is independent of employment growth. The EIR quantifies housing demand due to the project and cumulative San Francisco office development, and compares that demand to the growth of the Bay Area housing supply as stated in Projections 79 by ABAG.

Regional Housing

RESPONSE (Continued)

The analysis of housing market impacts of cumulative downtown office development does not assume that all suburban housing would be occupied by San Francisco office workers. As shown in Table B-2 on page 143 of the Supplemental EIR, housing demand attributable to downtown San Francisco growth would comprise from 14.7% to 17.7 % of projected regional housing stock growth between 1982 and 1990. Housing stock projections made by ABAG encompass many factors, including regional employment growth. Net housing stock growth, primarily provided by the private sector, is expected to respond to increased housing demand resulting from regional employment growth, including office-employment growth in San Francisco, to the extent that the economics of the housing market make increased housing possible.

An estimate of regional housing demand is not available from current data sources. The Report of the Citizen's Housing Task Force (San Francisco, July 29, 1981) projects a need for 30,000 dwelling units in San Francisco between 1980 and 1989. This projection was made using a similar office development basis as considered in the Supplemental EIR, and also included housing needs resulting from demographic trends independent of office development. ABAG's Housing Needs Report (Berkeley, December 1981) projects a need for 12,000 units in San Francisco, 51,200 units in the North Bay, 71,700 units in the Peninsula and 82,000 units in the East Bay between 1980 and 1985. Housing "needs," as used by ABAG, is not the equivalent of demand. The needs projection includes demand, but also reflects capacity, i.e. areas where increases in the housing stock are probable and in conformity with local plans and policies. Both the Report of the Citizen's Housing Task Force and ABAG's Housing Needs Report reflect the fact that new household formation in the Bay Area will result not only from economic development, but also from children reaching maturity, immigration, and other demographic factors independent of office development in San Francisco. Table B-2 reflects only the effect of office development in San Francisco.

Concerning housing increases between 1960 and 1981, the following table is provided.

VIII. Summary of Comments and Responses

TABLE A: REGIONAL HOUSING UNITS, 1960 AND 1980

	<u>Total Occupied</u>			<u>Owner Occupied</u>			<u>Renter Occupied</u>		
	<u>1960</u>	<u>1980</u>	<u>% Change</u>	<u>1960</u>	<u>1980</u>	<u>% Change</u>	<u>1960</u>	<u>1980</u>	<u>% Change</u>
Alameda	295,367	426,092	44%	166,172	226,137	36%	129,195	199,955	55%
Contra Costa	117,858	241,534	105%	85,710	164,860	92%	32,148	76,674	139%
Marin	44,209	88,723	101%	29,461	53,196	81%	14,708	35,527	142%
San Francisco	291,975	298,956	2%	102,141	100,786	-1%	189,834	198,170	4%
San Mateo	135,179	225,201	67%	97,803	134,341	37%	37,376	90,860	143%
Solano	38,453	80,426	109%	22,046	50,851	131%	16,407	29,575	80%
Santa Clara	184,945	458,519	148%	127,130	273,561	115%	57,815	184,958	220%
Napa	18,867	36,624	94%	13,166	23,894	81%	5,701	12,730	123%
Sonoma	47,191	114,474	143%	31,052	72,728	134%	16,139	41,746	159%
Total	1,174,044	1,970,549	68%	674,681	1,100,354	63%	499,323	870,195	74%

SOURCE: US Census, 1960 and 1980

Concerning the regional housing supply, see the response under Regional Impacts.

Cumulative Housing

COMMENTS

Sue Hestor: "Please note that all of the condos that you have approved on site under the OHPP and given multiple credits to in each instance, are affordable, by terms of your own EIR's, to people making \$200,000 a year, and those people are not particularly desperate for housing and have lots of choice in the market -- please note the fact that you are giving bonuses and credits for housing that is probably not going to be occupied by people as their primary residence, simply because of the cost.

"On Page 11, . . . one of the things that is missing -- availability is only one factor -- is affordability. . . . And to the extent that people can't find affordable housing or available housing, commute patterns are going to change. . . . And open space -- are we putting demands for taking open space away from the East Bay? Are we ultimately putting pressure for taking . . . areas in Northern San Mateo County because the housing pressures are so bad? There's open space plans for the region as well as open space plans for all of the cities. Are we making decisions here in conjunction with cumulative development that is happening in the Bay Area that is going to have the end result of putting pressure on taking away open space that people fight battles over all over the region? . . .

". . . On Page 12, I find it somewhat disingenous that you talk about your inability to quantify the housing demand because you really don't know anything about employees, and would point out that in every one of these project approval resolutions, you quantify, with exact numbers, the number of employees. . . . You say we can't figure out what the demand will be because we don't know how people are going to make tradeoffs, . . . yet [in] the statement of overriding considerations, you, in every case, make an exact [statement of the number of] jobs that are going to be created. How do you magically come up with an overriding consideration and, at the same time, never have the information to deal with housing problems?

". . . On Page 13, . . . you say 'Most project employees would not be able to afford ownership housing in San Francisco, although a significant minority . . . would.' . . . Quantify that.

VIII. Summary of Comments and Responses

Cumulative Housing

COMMENTS (Continued)

"What is the percentage here? It says, 'Most project employees, except the lowest-paid clerical employees, would be able to afford rental housing in San Francisco.' What amount of rent are they going to be paying for that?"

Commissioner Bierman: "Page 11, talking about the housing stock and the demand created in San Francisco by these buildings. . . . 'It has been suggested, although there is some dispute, that gentrification - - would occur'. It seems sort of an editorial comment. I don't know who is disputing it. . . . Where I go in the City and the community meetings I go to, there is no dispute. Maybe you can say who is doing the disputing.

"Page 13. . . . talking about people who can afford ownership of any of the housing being created. It says 'a significant minority.' What is the significant minority and where are the figures to judge 'significant'? Does it depend on the 601 Montgomery EIR? If so, it seems to me that the 601 EIR differs from the way the Planning Department does some figuring. . . . 601 Montgomery indicates that the medium, the middle, and I don't know quite how they say it, but the people in that building can afford \$52,500 to purchase -- which I think is much higher than we are figuring, which is somewhere between \$20,000 and \$30,000. So I would like that all clarified."

RESPONSE

The OHPP standards for housing units and credits do not include a requirement of primary residence nor do they place a limit on the price of residences. Because a residence is expensive does not mean that it will not be a primary residence. Data on the proportion of high-cost units that serve as primary or secondary units are not available.

Cumulative Housing

RESPONSE (Continued)

A discussion of housing affordability is contained on pages 11-13 of the Supplemental EIR and is not missing, as suggested by the commenter. As stated on page 30 of the Final EIR, the vacancy rates for ownership and rental housing in San Francisco and the region are low, indicating that availability is constrained. Rising housing costs and low vacancy rates, however, are not exclusively the result of downtown office development. Although there seems to be sufficient demand, housing construction is currently lower than production levels prevalent in the 1970s. Factors contributing to the low construction rate include the national economic recession, and high construction costs and interest rates.

Suburban housing developments may occur on land that was previously undeveloped or as in-fill in areas already developed, or as a combination of the two. New housing is located in conformance with local (city and county) General Plans. Open space is designated by such General Plans. Use of designated open space for other purposes would require policy changes in such plans by the planning commission and legislative body (city council or board of supervisors) having jurisdiction. Similarly, use of parcels designated as agricultural preserves would require local policy actions if they were to be used for housing. Such actions are not within the jurisdiction of San Francisco.

Downtown office development is the result of a regional demand for office space. If this demand for office space were not met in San Francisco, it is likely that more office development would occur in surrounding counties. Should office development that does not occur in San Francisco occur elsewhere in the Bay Area, the net regional employment growth would probably be about the same, and the regional housing market impacts would also be about the same. Housing developments to meet increased suburban office employment growth would similarly affect the pressures on undeveloped land.

Cumulative Housing

RESPONSE (Continued)

If office development did not occur in San Francisco but occurred on undeveloped suburban land, the resultant loss of open space would be an indirect impact of not developing office space in San Francisco. San Francisco already has infrastructure that can serve development, particularly its transportation, sewer, fire and police protection systems. In many locations suburban development would require more capital-intensive infrastructure improvements and would contribute to problems of urban sprawl and related physical impacts.

The housing analysis in the Supplemental EIR states that all net employment growth in San Francisco due to the project would not occur on the project site. Some employment growth would occur in office space previously occupied by project tenants. The amount of off-site employment growth cannot be reliably calculated. This EIR and project approval resolutions refer to the net increase in on-site employment. This number may or may not equal net employment growth that would occur throughout the City as a result of the project.

The last sentence of the first full paragraph on page 11 of the Supplemental EIR has been replaced with the following: "The possibility exists that gentrification - the replacement of lower-income households by more affluent ones - could occur./2/" Footnote /2/ on page 16 remains the same.

In the fourth sentence of the second full paragraph on page 13 of the Supplemental EIR, "a significant minority" has been changed to "some households." The exact proportion of households with project employees that would be able to afford ownership housing cannot be quantified. The most critical data that would allow housing affordability to be more precisely quantified, the distribution of household income of project office workers, is not available. Data that is available is provided in Table B-3 on pages 144-145 of the Supplemental EIR. Published data sources on individual office worker incomes indicate a range of \$8,300 to \$300,000 annually. A survey of employees at 601 Montgomery Street for the Montgomery-Washington

Cumulative Housing

RESPONSE (Continued)

Building EIR, January 28, 1982 (81.104E), indicated the upper income range (see footnote "d" on p. 145 of the Supplemental EIR). Sources of information for the incomes of management and professional occupations is limited. Nevertheless, based on available data, it is probable that some households containing project employees would be able to afford ownership housing. The number of households with project employees who would be able to afford ownership housing cannot be quantified. The income distribution of office-worker households which would gain employment in the 135 Main Street project, or in all office projects generally, cannot be predicted with sufficient accuracy to allow such calculations.

For similar reasons, the exact percentage of office worker households that would be able to afford rental housing is not known. Determination of each employee's financial status, as stated, is impossible because of the variable factors which influence each person's financial capability, such as savings, debts, and other sources of income. From Table B-3 on page 144 of the Supplemental EIR, an annual income of \$11,560 would be necessary to afford the median rent for studio apartments, based on a survey by the Department of City Planning. Although the exact income distribution of office worker households is not known, available data indicates that most office worker households earn more than \$11,560; the median income of office workers has been estimated to be \$25,000 to \$30,000. (This discussion of office worker income is based on the 466 Bush Street Final EIR, 81.175E, certified August 26, 1982, pages 41-42, which is hereby incorporated by reference.) Households with two clerical workers earning \$12,500 each would be able to afford about \$625 monthly for housing costs.

Estimates of the number of on-site employees are made by applying a square-feet-per employee formula. Housing demand attributable to direct on-site increases in employment is quantified in Table B-2 on page 143 of the Supplemental EIR and on page 72 of the Final EIR.

VIII. Summary of Comments and Responses

Muni Costs

COMMENTS

Sue Hestor: "On the Muni discussion on Page 14, you are continuing to rely on Mr. Bernhard's conversation. That is the perpetual footnote for the cost for Muni. The figures that you should be using are for the report done for the downtown assessment district. Those figures are much higher. Mr. Bernhard's figures result in some wild underestimates of cost to Muni. . . .Your figures come up with wildly disparate numbers from the City's own studies that are done to justify the downtown assessment district. I think the downtown assessment district [study] -- has much more reliability than a phone call from Bruce Bernhard. And I am tired of reading that as the source of information for Muni costs.

"On Page 15, . . . there's this memo . . . from Mr. Macris . . . that justifies Muni's ability. I haven't seen that memo. I guess I would really like a copy of it. Muni's plans to accommodate downtown growth is the definitive statement of how the Muni is going to be able to serve all of this building. I find that to be staggering, that the Planning Department, rather than the Muni, is the source of that information. . . . I challenge that document, partly because I haven't seen it."

[Reference to Carl Imparato comments on previous EIRs on MUNI cost analysis. I am attaching an analysis of the inconsistent figures used in San Francisco EIRs to estimate costs of MUNI service. To show how ludicrous the calculations used by Bernhard are:

Table 2, page 19 shows that cumulative development will add 12,000 new pm peak MUNI riders

Page 20 notes that with cumulative development the peak pm riders will total 34,300

12,000 divided by 22,300 (34,300 minus 12,000) shows that peak pm MUNI ridership will increase 54%

VIII. Summary of Comments and Responses

Muni Costs

COMMENT (Continued)

Bernhard says that such service is provided at a cost per ride of 71¢, with average ride revenue of 32¢, leaving a deficit per rider of 39¢

Therefore the daily cost to provide pm service is

$$71¢ \times 12,000 = \$8,520$$

and the daily deficit for that service is

$$39¢ \times 12,000 = \$4,680$$

Multiplying that times 260 work-days and doubling it to add people getting to work in the morning

$$\$8,520 \times 260 \times 2 = \$4,430,400 \text{ annual cost to provide MUNI service to } 12,000 \text{ new riders}$$

$$\$4,680 \times 260 \times 2 = \$2,433,600 \text{ annual deficit to City in providing MUNI service to } 12,000 \text{ new riders}$$

THIS IS MARVELOUS. A 54% INCREASE IN RIDERSHIP AT A COST OF MERELY \$4.4 million per year.

Please provide the above calculations to not only Bernhard, but also to Sklar and the members of the Public Utilities Commission and ask if they are willing to stick by the phone call between ESA and Bernhard as the definitive statement on the costs to MUNI of providing greatly increased service. Do you, ESA, and you, OER, believe those figures are real? Please remember that the law requires you to certify that the information is accurate and objective.]

Commissioner Bierman: "Further on down at the bottom of the page: 'According to a memorandum entitled 'Muni's Plans to Accommodate Downtown Growth' issued by Dean Macris, Director of Planning, (August 5, 1982), Muni expects to be able to meet projected cumulative demand due to downtown office development without new City taxes.'

Muni Costs

COMMENT (Continued)

". . . My recollection of the memo that our director presented to us to take care of the need [is that] there will have to be revenue bonds. . . . I think we should be more realistic in a document like this."

RESPONSE

The memorandum by Dean Macris, cited on page 15, was presented to the City Planning Commission at its weekly meeting on August 5, 1982 and has been available to the public. It was described in a two-column news story in the San Francisco Examiner on August 9, 1982. In the memorandum Mr. Macris states that "the memorandum has been prepared with the assistance of Public Utilities Commission staff." A copy of that memorandum has been added to the Supplemental EIR as Appendix G.

The following sentence has been added to the last paragraph on page 15:
"According to the worst-case scenario in the memorandum, the San Francisco Municipal Railway Improvement Corporation, a non-profit corporation established in 1971 for the purpose of selling bonds for transit improvements, may have to raise about \$111 million through the sale of bonds over a ten-year period to finance Muni expansion." The Muni capital improvements outlined in the memorandum are based on transit demand resulting from the employment trend approach, discussed on pages 158-161 of the Supplemental EIR.

The Muni cost estimate contained in the EIR is based on a marginal cost analysis prepared by Muni. The results of the analysis were provided by Mr. Bruce Bernhard, Muni's Chief Accountant. Marginal cost per passenger trip refers to the additional cost to Muni of adding an additional passenger at the peak hour of Muni's load. This analysis technique is only applicable to small additions of passengers, such as passenger trips added by a single office building. As stated on page 16 of the supplemental EIR, "Muni is unable to provide more recent data on cost and revenue figures per passenger" (see note /7/).

Muni Costs

RESPONSE (Continued)

In her written comments, Ms. Hestor suggests the use of a marginal cost analysis for cumulative development. The application of the marginal cost analysis methodology to cumulative development, as suggested by Ms. Hestor on page 3 in her letter comment, is inappropriate because marginal cost data includes only variable costs that depend on vehicle trips, including fuel, labor, parts, and amortization of the capital costs of vehicles. Other incremental costs, such as the need for more supervisors, overhead (e.g. accountants), new facilities for vehicle storage, and other capital improvements are not included in a marginal cost analysis./1/ The cost analysis contained in the Supplemental EIR is appropriate for small incremental projects but not for a cumulative determination. Therefore, the EIR does not apply the marginal cost method to the cumulative analysis.

A more appropriate technique for determining the costs to Muni of cumulative development would be an average cost analysis which would include both capital and operating costs. Application of this technique, however, is limited because relevant capital cost data are not available from Muni. Further, capital costs are difficult to allocate on a person-trip basis as capital expenditures occur from time to time in large amounts, not necessarily annually. The established method of allocating capital costs is through depreciation, which is based on historical depreciation costs, not replacement costs. Such an estimate would be low in comparison with the costs of new capital improvements required for a single passenger trip. The use of existing capital cost data would underestimate future capital cost needs. Existing Muni accounting statistics do not enable future capital costs to be calculated on a per passenger trip basis./1/

The data contained in the study prepared on the proposed transit assessment district/2/ cannot be applied to determining the costs to Muni of cumulative downtown development. It was generated to calculate the net current deficit of Muni on a per-square-mile basis. The study also contains data on operating costs per passenger mile and revenue per passenger trip. The total number of

VIII. Summary of Comments and Responses

Muni Costs

RESPONSE (Continued)

downtown passenger trips was not determined, however, for the purposes of the study. According to Bruce Bernhard, Muni Chief Accountant/3/ the net deficit per passenger trip cannot be calculated from the data given in the assessment district cost study. According to Mr. Bernhard, data is not currently available that would enable costs per square mile to be translated to a per-passenger-trip basis as would be required for an average cost analysis. The information contained in the memorandum on Muni's Plan to Accommodate Downtown Growth, by Dean Macris, which is based on aggregate demands for transit provided by cumulative development, and sets forth alternative methods of funding such plans, contains the most current and reliable data on the subject.

NOTE

/1/ Bruce Bernhard, Muni Chief Accountant, telephone communication, October 20, 1982.

/2/ City and County of San Francisco, Office of the City Attorney, Transit Assessment District Cost Study, October 1, 1981.

/3/ Bruce Bernhard, Muni Chief Accountant, telephone communication, October 26, 1982.

BART Costs

COMMENT

Commissioner Bierman: "Page 16 speaks to a BART deficit generated by this project. . . . Since one of the concerns in here is about cumulative problems, I think we ought to also have a calculation very plainly stated here what all the downtown approved and in-the-process buildings, any that we know, what that brings the BART deficit to. . . . It could be a significant figure.

RESPONSE

The estimate of costs to BART which are attributable to the 135 Main Street project is based on an analysis of average operating costs per passenger trip prepared by BART. Operating costs per passenger trip reflect the additional cost to BART of additional passengers. This analysis technique is only applicable to small additions of passengers, such as passenger trips added by a single office building. A cumulative analysis would also have to include capital costs that may be necessitated by a large increase in passenger trips.

Capital cost projections made by BART through 1990 are approximate in nature. Capital costs (both existing and future) cannot be prorated by geographic location (San Francisco), time of day (peak hour), or type of rider (office workers). Most of BART's capital expenditures are paid through federal and state revenue sources./1/

The cumulative peak-hour operating deficit cannot be projected because exact fares and subsidies per passenger cannot be projected to 1990. It can be stated that both fares and costs per passenger trip will be higher in the future than they are today. These higher dollar values, however, will be partly attributable to inflation. BART fares and costs relative to inflation cannot be projected with accuracy. The further projections are made into the future, the larger the margin of error./1/

VIII. Summary of Comments and Responses

BART Costs

RESPONSE (Continued)

For fiscal year 1981-82, BART attained a net operating surplus of \$7.6 million after applying \$67.3 million in financial assistance from property taxes, the one-half percent BART sales tax, and state aid. In 1981-82, BART used \$2.6 million of this surplus to purchase capital improvements./2/

The BART 1982-87 Five Year Plan projects an overall operating surplus (after property tax, sales tax and other governmental assistance) of \$60.4 million from Fiscal Year 1982-83 to 1986-87./2/

These funds could be applied to capital improvements by BART to meet cumulative transit needs of the region.

NOTES

/1/ Alan Lee, Transportation Planner, BART, telephone communication, October 18, 1982.

/2/ "BART 1982-87 Five Year Plan," adopted June 24, 1982.

VIII. Summary of Comments and Responses

Transit Assessment

COMMENT

Commissioner Bierman: "Page 15 says the Board of Supervisors have withdrawn the proposal for a transit assessment district. I thought it had been postponed. I am not sure, but my impression was that it was postponed."

RESPONSE

The second sentence of the last paragraph on page 15 of the Supplemental EIR is replaced with the following: "This transit assessment district may no longer be applicable because the Mayor withdrew support for the measure at this time. The Board of Supervisors may consider as a substitute an increase in business taxes." The first sentence of that paragraph does state that the Board of Supervisors has postponed "acting on the proposed transit maintenance assessment district until January 1983."

CUMULATIVE DEVELOPMENT LISTS

COMMENT

Sue Hestor: "On . . . Page 7, . . . where you talk about your lists, you ignore all of the Redevelopment Agency. . . . The Redevelopment Agency projects magically . . . don't affect the City. They are omitted from all of these lists. You can't do that. . . . I want to put on the record . . . that you have already approved -- you have no further say on YBC, Western Addition 1, and Western Addition 2 -- and I don't know if you have anything further to say on Rincon Point. You must assume as a given all of the square feet that was approved in those projects, or justify to the public how you can leave them out. You leave out millions of square feet of development.

". . . At what point do you factor into your cumulative impact analysis the projects that are in redevelopment areas? . . . To the extent that the Planning Commission has any approval rights, you have approved YBC. You have approved all of the things that the basic right to build is when you approve the plan, then the Redevelopment Agency implements. . . . What have they not implemented? It took them a long time for Embarcadero 4, but they finally implemented it. It is taking them a long time on Western Addition, but they are finally implementing it. Yet you zero it out. Put that in as approved projects or maybe under formal review, but don't leave it out and leave it zero, because that's millions of square feet of office buildings and millions of square feet of hotels and retail spaces, especially in YBC. And it just doesn't appear.

"Rather than read into the record all the projects that are missing, I will give your staff a list. I have a list of projects that are missing under the 'under formal review', all of which have numbers from your office and all of which I think should be evaluated. I, in particular, point out that the residence element EIR on Page 36 assumes as a given the Mission Bay project and the Rincon Point-South Beach project." (The list is set forth in Ms. Hestor's letter of October 8, 1982, which is attached as Appendix F.)

CUMULATIVE DEVELOPMENT LISTS

COMMENT (Continued)

"At page 36 of your Department's Draft EIR on the Residence Element, it says there will be 40,000 new daytime workers in the Mission Bay project, which is approximately eight to ten million square feet, plus 16,000 residential units. Rincon Point-South Beach is going to have 7,000 daytime workers, which according to your calculations is probably 1.75 million square feet, and 8,000 residential units. You are using those 24,000 housing units to show you are dealing with housing problems. Damn it, if you are going to do that, you have to put it in this EIR and all those other cumulative impact lists. You either have to take out all of that residential stuff from Mission Bay, which you are touting as new housing production and how you are going to save the problems of this City, or you have to put that stuff in here. I am not going to let you get away with it. That Draft EIR is authored by this department. You have had a hearing on it. You need to factor in 11.75 million square feet for those two projects in your cumulative impact list or tell the public how you can be so dishonest as to say it exists in one EIR and it doesn't exist in another EIR, and tell the court how you can do that.

". . . I am offering as part of [that] cumulative development list today's Chronicle, Page 7 and 8. The article is entitled "Projects Along Bayshore Likely to Worsen Traffic." . . . Twenty million square feet of commercial space is in the works. Some of that is in San Francisco's Executive Park -- which you also dropped out of your list. San Francisco's Executive Park puts demands on the regional and San Francisco traffic and transit capacity and on housing and on air quality. That has to be part of your analysis. You can't just drop it out because it isn't in the boundaries of the C-3-0 district, and it's a lot, all of that development down near the Candelstick Park. Please factor in all of these projects as part of the regional housing, air quality, traffic, [and] transit problems. [This needs to be included in the analysis of cumulative impacts of San Francisco development because of the role of that corridor in moving people into Downtown San Francisco and of the limiting of capacity that might be occurring.]

"[Under 'Approved Projects'] Block 3722 is 3732. Please provide square feet for each project."]

CUMULATIVE DEVELOPMENT LISTS

COMMENT (Continued)

Commissioner Bierman: ". . . I have . . . qualms about leaving out all of the Redevelopment Agency figures, particularly YBC. We have held hearings. We know that they are very well along on the way for massive figures. And if you can't include them as part of the approved, then you should at least include them as part of some kind of figure that can be included if somebody wants to be realistic. Those figures we have read. I mean, we are already in the process with those EIR's. We have read that the figures for intersections will be such and such. I don't know how they can be left out.

RESPONSE

As stated on page 7 of the Supplemental EIR: "The cumulative list does contain those office buildings in the Yerba Buena Center Redevelopment Area which are under construction or for which Land Disposition Agreements have been approved and which have definitely identified floor area figures." The projects included are the National Maritime Union, Block 3751, 80,000 sq. ft.; Office Building, SB-1, Block 3752, 11,000 sq. ft.; Yerba Buena West, Block 3724, 300,000 sq. ft.; and Convention Plaza, Block 3735, 339,000 sq. ft.

Actions by the City Planning Commission approving Redevelopment Area Plans constitute approval of a general plan with a range of permitted uses and floor areas but no precise floor area figures for each parcel. These are determined by the Redevelopment Agency in negotiations with accepted developers. Thus negotiations are presently under way with a developer for the central blocks of Yerba Buena Center. Unless and until the negotiations are completed and a Land Disposition Agreement (LDA) is made, there are no floor area figures, by type of use, for those blocks that would be comparable with those included in the list used in the cumulative analysis.

Although a maximum limit on development has been established in each redevelopment area, there is not enough information about proposals which have not obtained an LDA to provide reasonably accurate calculations of cumulative

CUMULATIVE DEVELOPMENT LISTS

RESPONSE (Continued)

impacts comparable to those included in the cumulative project list. If the maximum amount of office space permitted by the YBC plan were included, however, the cumulative total for projects under review would be increased by 1.9 million square feet, or 11%. It should be noted that the maximum floor area permitted in a redevelopment area by an approved Redevelopment Plan, like the maximum floor area allowed in a zoning district by a zoning ordinance is seldom, if ever, attained. It would be unreasonable to suggest that all the potential floor area permitted by commercial zoning districts in San Francisco be counted in the cumulative list for analysis in a single-project EIR.

The Yerba Buena Center Redevelopment Area (YBC) has been the subject of environmental review since 1973. In 1978 an EIR was certified covering four distinct development alternatives with variants and one tentative proposal for the 86-acre YBC area. In 1981, a Supplement to the 1978 EIR was certified pertaining to a development program for the block fronting on Market Street, which had not been covered in the 1978 FEIR. In May 1982, a Second Draft Supplement (82.35E) to the EIR was published which presents an additional development alternative for the entire YBC area and four one-block variants. A public hearing on the Second Supplement DEIR was held in July. This Second Supplement is expected to be considered by the City Planning Commission and Redevelopment Agency Commission for certification in December, 1982.

As noted, those parcels within YBC that have buildings under construction or approved LDAs are already included in the transportation and other cumulative analyses in the Supplemental EIR. the disposition of all other vacant parcels and lots on which buildings are located that are not slated for preservation is under the control of the Redevelopment Agency Commission. The Agency Commission could elect to approve any of the uses that have received environmental review in the 1978 FEIR and two Supplements (after certification of the Second Supplement), or which may receive environmental review in the future. To precisely state particular uses and amounts of floor areas for YBC parcels for which specific plans have not been approved would give a false impression of knowledge or accuracy and could be misleading.

CUMULATIVE DEVELOPMENT LISTS

RESPONSE (Continued)

The development potential for the Mission Bay and Rincon Hill areas is presently in preliminary stages of planning. Eleven alternatives are under consideration for Mission Bay. A planning and feasibility study is being made for Rincon Hill. No project approvals have been applied for; the amount and type of development has not been established for either area.

The Residence Element of the Master Plan is a general plan not tied to specific projects or to a specific time schedule. It provides a broad plan and guide for future development. The project list used in this project-specific EIR is, as noted, a list of specific projects which have completed or are undergoing formal public review leading to authorization to construct.

Of the projects requested to be included in the cumulative analysis, many are already on the list and most are not appropriate to include in a cumulative analysis of downtown projects.

Some projects are already included on the list of projects used for cumulative analysis: 291 10th Street; 195 Berry, also called China Basin Building and approved for 196,000 square feet of office space; the Gift Mart, listed under the name "Convention Plaza"; Welsh Commons; and 690 Second at Townsend. Others have filed no applications and are therefore not appropriate to consider in the foreseeable future: 1066 Broadway, Trinity Plaza, Hills Brothers, 1670 Pine. General possibilities, including housing or a shopping center or office space, with and without parking, have been described in newspaper articles about Trinity Plaza at 8th and Market Streets, but no application of any kind has been filed for this site.

Several projects requested to be added were approved a few years ago and have since been completed: Holiday Inn Fisherman's Wharf, 1625 Van Ness and 483 Third Street. They are part of the base case and would be double-counted if included in the cumulative analyses.

CUMULATIVE DEVELOPMENT LISTS

RESPONSE (Continued)

The following proposals are hotel or residential uses: Olympic Club Hotel, Warfield Hotel, 790 Van Ness, 990 Columbus, Grosvenor Townhouse, Baber-Stockton/O'Farrell, Hilton Tower No. 2, Holiday Inn, Holiday Inn-Civic Center, Holiday Inn-Fisherman's Wharf (completed), Hotel Ramada, Meridien Hotel. As explained in the discussion of cumulative impact analysis methodology, travel characteristics for residential and hotel uses indicate that peak trips do not accumulate with office peak trips. See also the response under the Hotel Space comment on pages 78-80.

Projects proposed at 650 Seventh, 870 Brannan, 15th and Vermont, 101 Utah (Wholesale Mart addition), and 963 Pacific (1200 sq. ft.) are all non-office uses, such as wholesale showrooms, which have fewer employees per square foot and different commute times, modes, and distribution characteristics than office uses. Therefore, they do not contribute significantly to peak cumulative transportation or air quality effects.

The following proposals appear to be inactive and therefore have not been included: Fox Plaza addition (inactive since 1980), 301 Mission (inactive since mid-1981), and 99 Oak (inactive since late 1981). Three others, 275 Steuart, 199 Montgomery, and the Warfield Hotel no longer have building permit applications pending as sponsors withdrew the applications (that for 175 Steuart was withdrawn nearly two years ago).

Negotiations are under way between the General Services Administration and the San Francisco Redevelopment Agency for a site for a federal office building in Yerba Buena Center. If a building program were authorized by Congress in fiscal 1983, plans would be developed. Construction would be completed and occupancy would follow in the early 1990's. Funds for construction of a State building in San Francisco were requested but not included in the State budget for fiscal 1982-83. Construction and occupancy dates are unknown.

CUMULATIVE DEVELOPMENT LISTS

RESPONSE (Continued)

The following projects are not located in the greater downtown area which is the basis for the cumulative analysis: San Francisco Executive Park, Mission & Russia, 350 Beach, 1734 Union, 1969 Union, 2318 Fillmore, 395 Hayes, 1975 Market, Francisco Place, 1099 Sixteenth Street, 1735 Franklin, 1581 Bush, 644 Broadway.

The boundaries of the cumulative study area are generally described on page 8, Note/2/, of the Supplemental EIR. The cumulative development is generally contained in the C-2, C-3-0, C-3-R, C-3-G, and C-3-S zoning districts in the area described as well as in portions of the M-1 and M-2 zoning districts north of China Basin. The majority of the development (on a square footage basis) is proposed for the C-3-0 zoning district.

The cumulative study area selected was based partially upon the transportation facilities serving Downtown and partially upon topographic constraints. The transportation analysis focused upon the downtown street and transit system including the freeway access ramps. The location of the freeway access ramps partially form the boundaries of the cumulative area on the south and the west. The transportation analysis focused upon peak direction travel from the project (135 Main Street) vicinity. Developments within the cumulative study area were assumed to add travel in the peak direction (heaviest demand direction) on the downtown street and transit system. Locations such as Executive Park or the Bayshore Freeway corridor in San Mateo county would not have a similar effect.

Many projects are in very early stages of review by City agencies: Pine-Kearny Office Building, Union Square West (now called Block 331), 5th and Market, 900 Kearny, 505 Montgomery, 562 Mission, 1171 Sansome, 101 Hayes, 1601 Van Ness, 640 2nd Street, 400 2nd Street. These projects often change size or even uses proposed in these early stages or are withdrawn. Some have filed for review by the Department of City Planning but have not filed formal requests for approval.

CUMULATIVE DEVELOPMENT LISTS

RESPONSE (Continued)

For example, the Pine-Kearny project was first proposed as a hotel; the Block 331 project originally included several hundred new dwelling units, and the 562 Mission Street project has changed ownership two times since the original filing. These projects are therefore considered too indefinite to include until plans are better defined.

The Cumulative Office and Retail Development list, if updated to October 28, 1982, would include the following additional projects: AB 3717, Mission-Main, 342,800 sq. ft. (this proposal is on the project block and is included in the local pedestrian, loading, and circulation analyses in the Supplemental EIR); AB 3750, Second and Harrison, 228,000 sq. ft.; AB 3735, Planter's Hotel conversion, 20,000 sq. ft.; AB 738, One Flynn Center, 25,000 sq. ft.; AB 768, Franklin and McAllister, 53,600 sq. ft.; AB 3750, 642 Harrison, 45,900 sq. ft.; AB 3794, 155 Townsend, 19,000 sq. ft.; AB 143, 1000 Montgomery, 39,000 sq. ft.; and AB 141, 100 Broadway, 13,000 sq. ft. The updated list would also have the 1049 Market (108,000 sq. ft.) and Greyhound Bus Terminal (100,000 sq. ft.) projects removed. Both projects have been withdrawn from consideration by their project sponsors. In addition, the square footage analyzed for the Ferry Building was high and should be reduced by 173,000 sq. ft. of office space and 15,000 sq. ft. of retail space.

Most of these revisions have occurred since the Supplemental DEIR on 135 Main was printed. If the totals were adjusted to make these changes, net new office square footage would increase by about 0.4 million and retail square footage would remain about the same. As the analysis methodologies are accurate only to + 10-15%, a change of 0.4 million (2.5%) would not change the results presented in the EIR.

Based upon the joint MTC/BCDC report about employment growth in the Bayshore (US 101) corridor, cited by the commenter, the amount of development analyzed could generate about 62,000 peak hour person trip-ends./1/ The report states that about 10% of the trips would be from (or to) residential uses which could be construed as being already counted by the projections in this EIR.

CUMULATIVE DEVELOPMENT LISTS

RESPONSE (Continued)

Further, the report states that only 20% of the development would use the freeway north of Millbrae. Once transit use is accounted for, the number of vehicle trips is about 9,000 peak-hour vehicle trip-ends. The report is based upon existing vehicle use and occupancy patterns continuing into the future unchanged (the report assumes a 6% transit usage). Thus, as with the projections of auto use at the Caldecott Tunnel, (see page 97), the analysis is not sufficient to project actual future demand on the Bayshore, but rather is intended to identify that a change in future travel patterns would need to be made to allow all of the development to take place.

The correct notation for Assessor's Block 3732 will be made on Table C-1. The square feet for each project listed in Table C-1 is shown in the following list.

/1/ Draft Report - Travel Impacts of Proposed Development on the Peninsula along Route 101, MTC/BCDC, September 17, 1982.

Downtown Office Projects Under Formal Review 8/6/82

Assessor's Block	Case No.	Project Name	Office (Gross Sq. Ft.)		Retail (Gross Sq. Ft.)	
			Total	Net	Total	Net
			New Constr.	New Constr.	New Constr.	New Constr.
58	82.234ED	Roundhouse	45,000	45,000	0.	0.
112	81.258	Ice House Conversion (C)	209,000	209,000	0.	0.
136	81.245	955 Front at Green	50,000	50,000	0.	0.
176	81.673	Columbus/Pacific Savoy	49,000	49,000	22,000	22,000
228	81.610ED	569 Sacramento (C)	19,000	19,000	0.	0.
240	81.705ED	580 California/Kearny	350,000	280,000	6,000	6,000
265	81.195ED	388 Market at Pine	234,500	80,500	10,000	-8,500
269	81.132ED	Russ Tower Addition	405,900	405,900	0.	0.
270	81.175ED	466 Bush	86,700	86,700	7,800	2,200
288	81.461ED	333 Bush (Campeau)	498,400	458,100	20,900	20,900
288	81.687ED	222 Kearny/Sutter	269,400	202,400	10,000	-8,400
669	81.667ED	1361 Bush (C)	45,720	45,720	0	0
716	81.581ED	Polk/O'Farrell	61,600	61,600	22,400	22,400
3702	81.549ED	1145 Market	137,000	65,000	8,000	8,000
3703	81.494ED	1041-49 Market	108,800	108,800	43,000	30,100
3707	81.492ED	90 New Montgomery	124,300	124,300	3,350	3,350
3707	81.245C	New Montgomery Pl.	238,200	222,100	0	-6,100
3708	81.493ED	71 Stevenson	324,600	324,600	6,200	6,200
3733	82.29E	832 Folsom	50,000	50,000	0	0
3760	81.386	401 6th	7,000	7,000	0	0
3776	81.59	Welsh Commons	55,600	55,600	12,000	12,000
3778	81.630ED	548 5th/Brannan	250,000	250,000	0	0
3781	82.99E	Greyhound Bus Terminal	100,000	100,000	0	0
3786	82.33E	655 5th/Townsend	126,250	126,250	0	0
3789	82.31EV.	615 2nd/Brannan (C)	106,000	106,000	0	0
9900	81.63	Ferry Building Rehab	115,000	115,000	110,000	110,000
9900		Pier One Development	127,000	127,000	15,000	15,000
9900		Agriculture Building	27,000	27,000	14,000	14,000
TOTALS			4,220,970	3,801,570	310,650	249,150

Approved Downtown Office Projects 8/6/82

Assessor's Block	Case No.	Project Name	Office (Gross Sq. Ft.)		Retail (Gross Sq. Ft.)	
			Total	Net	Total	Net
			New Constr.	New Constr.	New Constr.	New Constr.
106	81.415ED	1299 Sansome	41,000	41,000	3,500	3,500
161	80.191	Mirawa Center	36,000	36,000	30,650	30,650
164	81.631D	847 Sansome	23,750	23,750	0	0
164	81.573D	50 Osgood Place	22,500	22,500	9,100	9,100
166	CU81.7	222 Front at Pacific (C)	142,000	142,000	0	0
166	80.15	750 Battery	105,400	105,400	12,800	12,800
206	81.165D	401 Washington at Battery	13,200	13,200	1,800	1,800
227	80.296	Bank of Canton	230,500	177,500		-800
261	81.249ECQ	333 California	640,000	466,500	15,500	15,500
262	81.206D	130 Battery	41,000	41,000	0	0
267	81.241D	160 Sansome	2,200	2,200	0	0
268	81.422D	250 Montgomery at Pine	105,700	65,700	8,000	8,000
271	81.517	453 Grant	27,500	27,500	6,200	6,200
271		582 Bush	18,900	18,900	0	0
294	82.870	44 Campton Place	7,600	7,600	0	0
311	82.120D	S.F. Federal	246,800	218,850	1,600	-9,440
351	DR79.24	Mardikian/1170-1172 Market	40,000	40,000	0	0
3512	82.14	Van Ness Plaza	170,000	170,000	6,000	6,000
3518	81.483V	291 10th St.	25,700	25,700	0	-25,700
3705	80.315	Pacific III Apparel Mart	332,400	332,400	0	0
3709	81.113ED	Central Plaza	353,100	136,300	17,400	17,400
3715	82.16EC	121 Steuart	33,200	33,200	0	0
3717	80.349	Spear/Main (160 Spear)	279,000	279,000	7,600	7,600
3717	82.82D	135 Main	260,000	260,000	4,000	4,000
3722	81.417ED	144 Second at Minna	30,000	30,000	0	0
3732	81.548DE	466 Clementina (C)	15,150	15,150	0	0
3724	81.102E	Holland Ct. (C)	27,850	27,850	0	0
3729	82.860	774 Tehama	5,800	5,800	0	0
3733	81.2	868 Folsom	65,000	65,000	0	0
3735	80.106	95 Hawthorne (C)	61,900	61,900	0	0
3738	DR80.5	315 Howard	294,000	294,000	3,200	3,200
3741	82.203C	201 Spear	229,000	229,000	5,200	5,200
3749	81.18	Marathon - 2nd & Folsom	681,700	681,700	39,300	39,300
3751	77-220	National Maritime Union	80,000	80,000	0	0
3752	77-220	Office Bldg. (YBC SB-1)	11,000	11,000	0	0
3763	81.287V	490 2nd at Bryant (C)	40,000	40,000	0	0
3763	81.381	480 2nd at Stillman (C)	35,000	35,000	0	0
3775	81.147V	338-340 Brannan (C)	36,000	36,000	0	0
3776	81.693EV	539 Bryant/Zoe	63,000	63,000	0	0
3788	81.296Z	690 2nd/Townsend (C)	16,600	16,600	16,000	16,000
3787	81.306	252 Townsend at Lusk	81,900	81,900	0	0
3789	81.552EV	625 2nd/Townsend (C)	157,000	157,000	0	0
3794	81.569EV	123 Townsend	104,000	49,500	0	0
3803	81.244D	China Basin Expansion	196,000	196,000	0	0
TOTALS			5,428,350	4,862,600	187,850	150,310

Downtown Office Projects Under Construction 8/6/82

Assessor's Block	Case No.	Project Name	Office (Gross Sq. Ft.)		Retail (Gross Sq. Ft.)	
			Total	Net	Total	Net
			New Constr.	New Constr.	New Constr.	New Constr.
163	81.1	901 Montgomery	63,000	63,000	18,800	18,800
164	81.251D	936 Montgomery-(disco)	21,500	11,500	0	0
167		Golden Gateway III	103,000	103,000	0	0
196		736 Montgomery	40,000	40,000	0	0
196	CU79.49	Pacific Lumber Co.	92,000	92,000	0	0
208	81.104EDC	Washington/Montgomery	235,000	233,300	4,000	-1,200
237	DR80.6	353 Sacramento (Daon)	277,000	251,000	8,300	-2,000
239	DR80.1	456 Montgomery	160,550	160,550	24,250	24,250
240	DR80.16	550 Kearny	71,400	71,400	0	0
263	CU79.12	101 California	1,265,000	1,257,000	24,700	-14,300
287	81.550D	Sloane Building (C)	125,300	125,300	30,000	30,000
288	DR80.24	101 Montgomery	264,000	234,000	5,900	-14,100
289	81.308D	One Sansome	603,000	603,000	7,000	7,000
292	DR79.13	Crocker National Bank	676,000	495,000	86,000	54,000
312	79.370	50 Grant	90,000	90,000	0	0
351	79.133	U.N. Plaza	92,050	92,050	0	0
762		Opera Plaza	50,000	50,000	0	0
3702	81.25	1155 Market/8th	138,700	138,700	8,800	8,800
3708	80.34	25 Jessie/Ecker Square	111,000	111,000	0	0
3709	80.36	Five Fremont Center	791,200	722,200	35,000	17,300
3712	79.11	Federal Reserve Bank	640,000	640,000	0	0
3715		141 Steuart	80,000	80,000	0	0
3717	79.236	101 Mission at Spear	219,350	219,350	0	0
3717		150 Spear	330,000	330,000	0	0
3718	79.12	Pacific Gateway	540,000	540,000	7,500	7,500
3724		Yerba Buena West	335,000	335,000	0	0
3735		Convention Plaza	339,000	339,000	0.	0.
TOTALS			7,753,050	7,427,350	260,250	136,050
GRAND TOTAL			17,402,370	16,091,520	758,750	535,510

VIII. Summary of Comments and Responses

TRANSPORTATION

Date of Existing Data

COMMENT

Sue Hestor: "On all of these tables in here that talk about transit and traffic and roadway capacity and intersection capacity, I find it very difficult to read them because I don't know when the measurements were done. . . . As a result, the cumulative impact table is totally nonhelpful. . . . You need information so that someone who picks up this table -- and it says 'existing' on Page 22. Existing as of what date? If you don't have dates, I can't tell whether it is right or not. If 'existing' was before 4 Embarcadero Center, 4 Embarcadero Center needs to be in your list of projects that are going to affect the calculations. . . . Was Moscone Center open when that project was measured or when that intersection was measured? Was 4 Embarcadero? Were all of the other projects that are coming on line and have been coming on line for the past two years, are they part of this? . . . "Existing levels of service." Existing as of what date? . . .

"Several of the appendices have more of the traffic tables in them. Some of them are in the body of the text, others are the in the appendix. For all of them, you need dates so that I can measure and you can measure whether you consider projects that have opened or have been coming on since the survey, because you have no information on which to base it right now."

RESPONSE

Table 4 on page 23 has been amended to add "(1982) +" after the word "Existing" on line 1. The footnote "+" has been added, reading: "Intersection counts made by ESA on August 8, 1982 (Mission at Spear and Main at Howard), June 23, 1982 (Mission at Beale), and October 29, 1981 (Mission at Main)."

Date of Existing Data

RESPONSE (Continued)

Table 3 on page 22 has been amended to add "(1982)+" under the word "Existing" in the first column. The footnote "+" has been added, reading,: "Ridership counts on BART are from March 1982; AC Transit ridership is a composite of weekdays on May 24 and 27, 1982 and June 3, 6 and 7, 1982; Golden Gate Transit ridership is for June 14, 1982; SamTrans ridership is from February 1982 and Southern Pacific-Caltrans counts are for February 25, 1982."

The footnote "****" has been modified to read: "1982 Muni ridership is approximate, based on a compilation of Muni ridership by Department of City Planning staff. Muni data are the average of the three most recent schedule checks (observations) made by Muni for each route between August 1981 and August 1982."

The title of Table D-2 on page 156 has been revised to read: "Table D-2: Existing and Projected Muni Load Factors* (PM Peak Hour -- Peak Direction)." The footnote has been expanded so that the last sentence reads: "The future load factors have been calculated using existing capacity and do not include any proposed capacity increases." The following is added to the footnote: "Ridership is the average of three most recent schedule checks for each route for the months of August 1981 to August 1982, as compiled by the Department of City Planning."

All of the base data have been collected since the opening of the Moscone Convention Center in September 1981. All but one of the intersection counts and portions of the transit data were collected after complete occupancy of 4 Embarcadero Center in May 1982. Initial occupancy of 4 Embarcadero Center started on April 20, 1981./1/ Travel demand from 4 Embarcadero Center would represent a 4% increase over the cumulative travel demand shown in Table 2, page 19. However, travel demand from partial (at least 50%) occupancy of 4 Embarcadero Center has been counted in the earlier base data so the overall

VIII. Summary of Comments and Responses

Date of Existing Data

RESPONSE (Continued)

increase from occupancy of 4 Embarcadero Center where it has not been counted in the earlier base data, would be less than 4%. No allowance for partial occupancy of 4 Embarcadero Center has been made.

NOTE

/1/ Bruce Jones, Director of Development, Embarcadero Center, telephone communication, October 26, 1982.

Retail Space

COMMENT

Sue Hestor: "I don't think that you can eliminate retail space in your transportation analysis. The Spear-Main Final EIR on Page 55 says that office space generates 17.5 person trips per day per thousand square feet. Retail space generates 100 person trips per day per 1,000 square feet. Even if you factor out retail space on-site in office buildings, like in this building, and say 50 percent of the trips are internal to the site, you still have many more trip ends which affects all of the things that you make findings on in terms of traffic, air quality, pedestrian and vehicular traffic, and transit. And, therefore, eliminating Neiman Marcus and all of the other retail space in your cumulative impact lists doesn't make any sense."

["It is not okay to drop retail space, since by terms of your own traffic analysis retail space generates more trip ends than office space, and there are consistent findings on pedestrian and vehicular traffic, transit and formerly air quality, which are all related to the amount of persons travelling to the site."]

RESPONSE

The cumulative development analysis has considered 0.5 million gross square feet of retail space proposed to be built in conjunction with office buildings as shown in Table C-2 on page 149. The analysis did not consider any free-standing retail space such as Neiman-Marcus. The text of the Supplemental EIR has been revised on pages 20, 23, 25, 35, and 77 where there is reference to the "16.1 million gross square feet of net new cumulative development" to read "16.1 million gross square feet of net new cumulative office space and 0.5 million gross square feet of net new retail space."

The only free-standing retail development downtown which is under formal review, approved, or under construction, is the Neiman-Marcus development which is under construction. The Neiman-Marcus store would generate about 200 new p.m. peak-hour person-trip-ends. This would be an increase of less

Retail Space

RESPONSE (Continued)

than 1% over the cumulative development increase shown in Table 2, page 19. The increase would be within the margin of error for the transportation analysis, i.e. after rounding to two significant figures, the increase would not be discernible.

The accuracy of projections contained in the cumulative transportation analyses is limited by the accumulated accuracy of the individual components. Essentially, the uncertainty in each component compounds, making the overall analysis as accurate as the least reliable component of the analysis. The base data, which are collected as a series of counts (intersection, transit ridership, parking) on individual days rather than being an annual average, are subject to seasonal variations (i.e., more people take vacations during summer months, shopping travel is highest between Thanksgiving and Christmas, fewer people walk when it rains) as well as economic variations that might result from changes in the cost of gasoline, transit fares, and parking costs. The forecast information is based upon trip generation, modal split, and trip assignments data that are available for existing conditions. The projections do not assume any deviation from existing patterns. As travel patterns tend to be influenced by a variety of factors, including congestion (i.e., each traveler tries to find the optimum method of travelling to and from work), cost, choice of residence location, and individual preferences, the results of the transportation analysis do not reflect possible redistribution of existing travel patterns. Possible changes in traffic patterns are not considered because no reliable method exists to predict the individual choices that would aggregate into future travel patterns.

Further, as the travel demand analysis was based upon the various estimates for land use allocation and amount of gross floor area associated with each building, the travel estimates are sensitive to changes in the projected amount of cumulative development. The cumulative traffic and transit impact analysis is sensitive also to 1) parking price structures and fuel availability and cost, which affect the modal split; 2) future traffic management changes in the downtown area which could take the form of increased

Retail Space

RESPONSE (Continued)

development of transit preferential streets and further restrictions of on-street parking in order to facilitate general vehicle flow; 3) future changes in the operating characteristics of each transit system, which are dependent on policy choices made at the local, regional, state and federal levels; 4) the rate of increase in intensity of land use downtown, with a resulting increase in pedestrian volumes which affect intersection capacity; and 5) changes in the pattern of residential development and choices by individual downtown workers of residence location.

In light of the above uncertainties, the quality of the available data, and the type of trip-generation model used, the overall accuracy of the travel demand projections is in the range of \pm 10-15%.

VIII. Summary of Comments and Responses

Hotel Space

COMMENT

Sue Hestor: "Also, eliminating hotel space doesn't make any sense when the findings that you have made on pedestrian impact -- for example, the pedestrian impact of the buildings downtown is heaviest at lunch hour. Hotels generate lunch traffic as well. They generate traffic both into the hotels from people that are coming to the hotel for luncheons as well as the tourists, the business visitors who come in and out of the hotel on lunch hour and come in and out of the hotel all day long. So you have pedestrian impacts in a downtown area, especially where you have proposed hotels in the central business district -- even if their peak hours for traffic aren't the same-- . . . you eliminate them totally. You say that their factor is zero. . . . And with the amount of hotel construction that is going on downtown, that has to be factored into the cumulative impact figures.

["It is not okay to drop hotel space - change the factors if you think it necessary, but they do not have a zero impact on pedestrian and vehicular traffic, etc. - and since they all generate employment, on housing demand. (Housing is also a factor in retail employment.) Do the relevant calculations, but don't eliminate the projects totally from lists of cumulative development."]

RESPONSE

Department of City Planning records show the following hotel developments proposed for downtown.

<u>Assessors Block</u>	<u>Name</u>	<u>Rooms</u>
<u>UNDER FORMAL REVIEW:</u>		
297	Olympic Club	374
<u>APPROVED:</u>		
325	Hilton Tower #2	410

Hotel Space

RESPONSE (Continued)

<u>Assessors Block</u>	<u>Name</u>	<u>Rooms</u>
326	Holiday Inn-Mason St.	805
742	790 Van Ness at Eddy	125
3701	Holiday Inn-8th St.	224

UNDER CONSTRUCTION:

330	Ramada Hotel	1040
3706	Meridien Hotel	700

The above hotel developments would have a total of 3,678 rooms. Based upon travel surveys reported in the EIR for Hilton Tower #2, January 29, 1981 (EE79.257), the total p.m. peak-hour trip generation would be 2,680 person-trip-ends which would represent an increase of 6% over the cumulative total shown in Table 2, page 19 of the Supplemental EIR on 135 Main Street. However, hotel travel patterns are different from office and retail travel patterns. Hotel employee travel would be primarily in the peak (commute) direction as would the majority of travel shown in Table 2. Hotel guest travel, however, would tend to be more evenly distributed (i.e. less than half would be in the peak direction) as guest arrivals would be in the contra commute direction. Of the 2,680 peak hour person trip ends, approximately 40% would be from hotel employees, 70% of whom would probably reside in the City. The remaining 60% of the trip-ends would be made by hotel guests, 70% of which would be trips made inside San Francisco. Thus only 30% of the p.m. peak hour hotel travel would be made outside of San Francisco. Based upon the travel survey information in the Hilton Tower EIR, the travel distribution for the cumulative hotel developments would be the following:

	<u>Employees</u>	<u>Guests</u>
Auto	314	592
Muni	418	467 (Cable Car and Recreational destinations)
BART	157	189
A/C	52)
SamTrans	21)
SPRR	21	38)
GGT Bus	-)
Ferry	10)
Other	52 (walk)	970

Hotel Space

RESPONSE (Continued)

The 970 "other trips" are assumed to be 140 taxi, 290 tour bus, and 540 walk trips.

Thus, the effective increase in peak-hour commute direction traffic and transit demand from the cumulative hotel development would be in the range of 2%-4% depending upon how much guest travel would occur in the peak direction of travel.

As the transportation analysis is accurate to within ±10%-15%, all of the increases would be within the margin of error for the analysis, i.e., after rounding to two significant figures the increases would not be discernible. None of the hotels would be close enough to the proposed 135 Main Street project to cause any effect on pedestrians visiting or working in the project.

Infrastructure

COMMENTS

Sue Hestor: "The second big question is that you talk in this EIR about history and the amount of expansion that occurred from 1960 to 1981. . . .You have nothing in there to explain the infrastructure that changed from 1960 to 1982. And if you don't have that in there, you have no way of judging whether the infrastructure can match that in the future. . . . BART was built.

"BART increased the capacity into San Francisco on transit. That matched, to a great extent, the amount of construction that went in. Is there going to be a second BART that moves that kind of capacity to match this demand?

"Muni Metro was added, as well as other improvements to the Municipal Railway, in that 20-year period. Are we going to match that improvement in the Municipal Railway over the next ten years?. . . .

"We have embarked on a sewer program. How much capacity is the sewer project going to have versus the new demand? New water lines. How much infrastructure has San Francisco plowed in, and with what money -- Federal, State, City, bond issue, private money -- has that occurred?

"SamTrans has been added in that period. Golden Gate Bridge Transportation District, with all of the buses, was added in that period."

"All of those system capacities happened historically while that last big wave of office building occurred. Project in the future and tell us how those systems will expand in a similar manner to meet that.

". . . Please tell me where the UMTA grants are going to come from so that we can have another BART. Please tell me where the gas tax money is going to come from so we can expand the freeway system. . . .Tell us how much the freeway and the roadway capacity in the Bay Area changed in the 20-year period from 1960 to 1980 that helped to accommodate downtown development. Tell us how much is going to happen in the next ten to twenty years.

Infrastructure

COMMENTS (Continued)

". . . On Page 6, . . . I think you really need to put in the infrastructure expansion that matched the development, where you say 'office buildings with a total space of approximately 32.3 million square feet were constructed between 1960 and 1981. Please tell me how much, first of all, what is the net amount?. . . Is that net or gross? . . . Please tell me what system capacity increase matched that and how much those system capacities are going to increase over the next year. These figures show a 28 percent increase in the next ten years."

RESPONSE

Since the infrastructure mentioned by the commenter was increased in the past to meet the demands of anticipated growth, it is reasonable to assume that the kind of planning and implementation responsible for that increase will continue in the future to meet demands created by increases in the population and in the consequent demands for housing, transportation, and the various public services and utilities associated with normal functioning of an urban region. Regional plans for the San Francisco Bay Area are based on a population of 7.5 million. The 1970 U.S. Census population total in the Bay Area was 4.6 million and the 1980 U.S. Census population total was 5.2 million. Action programs for water, sewers, transportation and other forms of infrastructure, based on regional and local plans, are expected to continue to be formulated and implemented.

BART originally was built not with Federal funds but with bond funds supported by property taxes. Federal monies have been used or allocated for equipment and track expansions to the system. Future policies concerning federal support of local transit systems are beyond the capability of an EIR to foretell, as they are subject to future national policies made on behalf of future national electorates. Expansion of the freeway system would be contrary to current policy which has curtailed development of the system to the full extent originally planned in the '50s and '60s. Future changes in this policy cannot be foreseen.

Infrastructure

RESPONSE (Continued)

During the period between 1960 and 1981, the transportation infrastructure in the Bay Area was expanded to meet projected regional transportation demands. The BART system and the regional freeway system are examples of this as planning for these two systems was based upon regional projections for 1990, including those from the Bay Area Transportation Study Commission published in 1965. Consequently, both systems were designed to have capacities sufficient to meet the 1990 demand levels. Thus, although the development that has occurred during 1960-1981 has used some of the planned capacity, it is not necessary to construct a new BART system to meet a like amount of demand. Rather it is only necessary to capture the unused capacity potential in the existing BART system through measures such as shorter train headways, longer trains, and more efficient operation. The regional freeway system has not been completed to the originally planned levels for a variety of reasons -- the Southern Crossing was not built, I-280, SR 24, and US 101 were not finished -- and consequently has less unused capacity potential than does BART. However, it is possible to optimize the capacity of the regional freeway system through increased vehicle occupancies (bus transit use and ridesharing) and minor modifications in key locations.

An example of this can be seen at the Bay Bridge Toll Plaza where in March 1975 free lanes were introduced for carpool vehicles. In the Spring of 1977, vehicle occupancy in the carpool lanes during the 6:30 a.m. to 9 a.m. commute period was an average of 3.52 persons per vehicle while in the other lanes the occupancy was 1.21 persons per vehicle. Average occupancy over all the lanes was 1.53 persons per vehicle (this is because there were more vehicles in the non-carpool lanes). In the fall of 1980, the carpool lane vehicle occupancy had increased to 4.0 per vehicle while the non-carpool lane occupancy had increased to 1.26 persons per vehicle. Overall vehicle occupancy increased to 1.9 persons per vehicle which indicates a proportionately greater increase in use of the carpool lanes./1/

Infrastructure

RESPONSE (Continued)

The increased importance of bus transit systems during the 1960-1981 period was a direct result of the creation of a new federal agency, the Urban Mass Transit Administration (UMTA), whose sole purpose was to fund and encourage local transit agencies. Each county was allocated funds by UMTA to be used to develop transit service. If no qualifying transit agency existed, the funds were banked until such an agency could be created. This is the process by which SamTrans was created to consolidate smaller local systems and the Greyhound Peninsula - San Francisco commuter service and to expand Peninsula service. Golden Gate Transit was created by the Golden Gate Bridge, Highway and Transportation District to replace Marin-Sonoma Greyhound commuter service and to expand bus and ferry service in order to provide capacity increases through means other than expansion of the physical structure of the Golden Gate Bridge.

In all of the bus transit systems, the necessary portion of the infrastructure, the street and highway system, is already in place. Increases in capacity can be accomplished through additional vehicles and route restructuring. It is not necessary to expand the street and highway system to increase the capacity of bus transit systems.

As discussed in the transportation section of the Supplemental EIR, all of the transit systems have 5-year plans for improving service that include the cost of providing that service. Funding for transportation infrastructure improvements comes from a variety of federal, state and local sources only one of which -- the state gas tax -- can be considered secure (a constitutional amendment is required to reduce the existing level of gas tax). However, implementation of improvements with gas tax funds is a matter of public policy as is the level of funding that comes from federal, state and local sources. Considering the uncertain nature of current government fiscal policy, any projection of future funding sources would be uncertain and unreliable.

Concerning housing increases between 1960 and 1981, and future expansion, see the response under Regional Housing on pages 44-46.

Infrastructure

RESPONSE (Continued)

Concerning the reference to 32 million square feet of office space on page 6, based on Table B-1 on page 141 of the Supplemental EIR, 32.3 million gross square feet of office space was constructed between 1960 and 1981, representing a net increase of about 29.1 million gross square feet of office space.

Concerning sewer capacity, sewage generated by cumulative downtown office development would add to the dry weather flow of the existing combined storm and sanitary system which has an excess dry weather capacity. Until completion of the City's wastewater expansion program which is now under way, cumulative development would contribute to existing overflows into the Bay during adverse wet weather conditions. Since those overflows are caused by citywide volumes of rainwater entering the combined sewer system, cumulative development would not cause a significant increase in the number of overflows or the volume of wastewater which may overflow. The expansion program is being implemented to provide improved treatment for combined sanitary sewage and rainwater runoff. The improvements are not related to increases in City office space.

Based on consumption of 125 gallons of water per day per 1,000 sq. ft. of office space,/2/ cumulative office development would require about 2.0 million gallons of water per day. During the fiscal year 1981-82, an average of 95 million gallons of water per day was distributed in San Francisco./3/ Cumulative development would increase water demand by about 2.1%. The City does not anticipate any problems in meeting systemwide increases in water demand./3/

NOTES

/1/ Traffic Survey Series A-48 and MA-55, University of California, 1978 and MTC, 1980.

/2/ Brown and Caldwell, Consulting Engineers, Report on Wastewater Loading from Selected Redevelopment Areas, February 1972.

/3/ Ray Quan, Senior Engineer, San Francisco Water Department, telephone conversation, October 26, 1982.

VIII. Summary of Comments and Responses

Transit Capacity

COMMENT

Commissioner Bierman: "Page 22, . . . a table about transit, . . . has in the column, third from the right, 'Existing plus cumulative plus project,' and has a figure 1.34. . . . I don't know what that means. I am presuming 'one' means the hundred, although I think before, 'one' meant a hundred and fifty. . . . If one means a hundred, . . . I would like to know, . . . how many would that be standing in the aisles to be the figure 'one'. Would that be the aisle full, more than full?

"Then what would 0.34 mean on top of that? . . . I think 'one' means using every space in the bus. . . . So what are they going to do and where are they going to be standing? How will they be handled?

"In another part of the document there is a figure, 1.47 and 1.69, about Muni. And I would like to know what those mean. What kind of crowding?"

RESPONSE

As stated in Table 3, page 22, in the first footnote, a load factor of 1.00 is equivalent to 100% of recommended seated and standing capacity being used. Recommended capacity differs for different types of vehicles and is defined differently by each transit agency. In all Bay Area transit systems, recommended capacity is less than actual physical capacity of transit vehicles ("crush loads"). The following table shows how many standees are included in load factors of 1.00 on each transit agency's vehicles:

Transit Capacity (Continued)

RESPONSE

TABLE B: STANDEES INCLUDED IN LOAD FACTORS OF TRANSIT SYSTEMS

<u>Agency</u>	<u>Vehicle</u>	<u>Maximum Seats</u>	<u>Recommended Standeers</u>	<u>Recommended Total</u>
Muni	Motor Coach (Average)	45	23	68
	Trolley Coach	50	25	75
	LRV	68	82	150
BART	All	72	36	108
AC Transit	Motor coach (average)	48	12	60
SamTrans	Motor coach (average)	47	12	59
Southern Pacific	Suburban Car	100	0	100
	Gallery Car	150	0	150
Golden Gate Transit	Motor Coach	45	10	55
	Sausalito Ferry	400	175	575
	Larkspur Ferry	510	240	750

The number of standees in the above table for Muni would represent almost full aisles while the number of standees for other agencies would represent partially full aisles. For Muni an additional 0.34 load factor would represent an additional 23 standees on motor coaches, 25 on trolleys and 51 on LRV's. In most cases the existing Muni vehicles would not be able to accommodate all of the demand represented by the additional 0.34 load factor.

The load factors cited (1.34, 1.47, 1.68) are all based upon existing (1982) capacity. Table 3 also shows load factors based upon proposed capacity. Muni load factors for proposed capacity for the future conditions are 1.12 for existing plus cumulative and 1.14 for existing plus cumulative plus the project. An additional 0.14 load factor represents about 10 additional standees on an average Muni motor coach which may be accommodated in a "crush load" condition. (Muni schedule checks show individual motor coach loadings as high as 1.34 times the recommended capacity, which would be about 90 persons on a motor coach.)

The Muni funding program to meet additional demand is discussed under Muni Costs, pages 52-56.

Golden Gate Transit

COMMENT

Commissioner Bierman: "Page 21, it talks about Larkspur Landing and . . . how Golden Gate Transit will solve problems. 'Average future loadings on Golden Gate Transit would not exceed capacity when the proposed additions become available.' This is talking about an increase of 70 percent on the ferry system, which I have most certainly not heard of. It is talking about a new ferry boat. The last two years we have heard nothing but talk of a decrease in ferry service, or at least some power wanting to decrease it. . . . It seems to me that line should say "would not exceed capacity if the proposed additions become available."

RESPONSE

Golden Gate Transit is currently operating only two of the three Larkspur ferries. The proposal for future ferry service improvements involves converting all three Larkspur ferry boats from gas turbine to diesel engines and using all three ferries on the Larkspur/San Francisco route. The district would be adding an additional ferry boat to the two it now has in operation but would not have to purchase an additional ferry boat to do this as it currently has one ferry in reserve.

Intersection Traffic

COMMENT

Commissioner Bierman: "Page 33. . . . talks about a way to handle traffic . . . as the traffic currently turning left . . . would redistribute to other intersections thus adding travel on the street system. If that were done, this is to keep intersections from being at Level F. However, if it is down here, how will that affect other intersections, and will they then become Level D, E and F instead of this particular intersection being that way? It seems kind of a superficial solution, without looking at what the ramifications will be.

"The same on the next page, although this one, I really couldn't understand, but it is talking about left turns and right turns and more green time. I wonder whether there has been a look at whether Muni would be affected by any of these particular changes they are suggesting to keep the intersections from being F. Perhaps it would help Muni, but it just isn't clear to me."

RESPONSE

The mitigation measures are suggested only as possible solutions. The Department of Public Works and Caltrans would have to study the two intersections and develop detailed plans prior to any changes being made. The two suggested measures would allow the signal timing at each intersection to be modified to better match the demand. If the Level of Service at both of the intersections could be improved, Muni operations would be improved, as intersection delay would be reduced. Prohibition of left turns at either intersection would require vehicles currently making left turns to use other routes. As most of the left-turning vehicles on Mission at Beale Street use the on-ramp, these vehicles would likely redistribute to other on-ramps further to the south, such as First and Harrison Streets to the Bay Bridge, and Fourth and Harrison Streets to the James Lick - Bayshore Freeway. Collectively, motorists will make shortest travel-time calculations as to which alternative route is most effective and the traffic will be distributed to make efficient use of all available roadways.

Parking

COMMENT

Sue Hestor: "Page 25, talking about parking deficits. . . . says that . . . the parking deficit may not be so bad because transit will probably take up the slack; cars will not be going around and around the block because people, if they can't find spaces, will then get on transit and will be doing ride-sharing. We can't have it both ways. If we are going to say that this deficit is not real, then you have to be sure that the transit figures include whoever it is you think won't be looking for the parking. . . . That to me is a big deficit, and that could mean a lot of people who would then be getting on the transit vehicles. . . . We should have some kind of prediction as to what that would mean.

RESPONSE

Prediction of a parking deficit is hindered by the inability to accurately predict modal shifts (i.e., shifts from single occupant autos to ridesharing or transit) and by the uncertainties of the City parking policy and implementation (i.e., how many spaces will the City approve in the future, where will they be located and how many existing spaces will the City allow or require to be removed or converted from long-term to short-term.) Consequently, parking predictions are made as shown on page 25 where a deficit based upon existing modal splits is projected. As the factors influencing modal choice -- such as availability of transit and carpools, desirable transit and carpool schedules, walking distance, parking location and availability, parking cost, employee subsidies of parking cost, etc.-- differ from individual to individual, it is not possible to predict precisely how future travel patterns may differ.

As stated on p. 26 of the EIR, all of the transit options (shifts) would add to the demands of the transit systems. Based upon the existing modal split and residential distribution, the 11,500 space parking deficit would represent approximately 33,500 person trip ends per day. If all of these trip ends were to shift to ridesharing (average 5.0 persons per vehicle) the parking demand

Parking

RESPONSE (Continued)

and deficit would be 3,350 parking spaces without any additional transit demand. Alternatively, if all of the person trip ends were to shift to transit there would be an additional 6,700 peak hour person trip ends on transit. Based upon existing modal splits, the 6,700 person trip ends would increase load factors on Muni and BART by 5%, on SamTrans and SPRR by 10% and on Golden Gate Transit Buses and ferries by 15% and the parking demand and deficit would be zero. The actual scenario would probably be somewhere in the above range between 3,350 and 6,700.

REGIONAL IMPACTS

COMMENT

Sue Hestor: ". . . You still are operating with a very narrow focus on San Francisco. The impacts that you are finding and the findings that you are making of significant impact revolve around things that have regional impact. The only exception to that is pedestrians. Every other finding that this Commission has made of significant cumulative impact is a cumulative impact that has regional magnitude. The EIR's have given you that information, and your findings certainly have to be looked at in that context."

"Further, BART doesn't just serve downtown San Francisco. . . . BART demand is also affected by new riders trying to get downtown in Oakland. . . . That kind of factor in terms of the regional transportation network is missing from here.

You presume that San Francisco can make all of the demands and get all of the capacity on Golden Gate, on AC, on SamTrans, on the Bridge. . . . What if part of the demand is going to be for people going north across the Golden Gate Bridge in the morning? How are they going to get there when San Francisco demand is so heavy that they compress the lanes by moving barricades? Those questions are missing from this EIR. . . . you can't do that when you look at roadways; you can't do that when you look at transit systems; you can't do that when you look at housing; and you can't do that when you look at air quality. We are presuming that all of the housing that we need in the suburban counties will be available for San Francisco."

" . . .the EIR's pull back from telling us at what point is it necessary to look at double decking of the Golden Gate Bridge? At what point is it necessary to look at a southern crossing? At what point is it necessary to look at having a new BART tunnel? . . . People don't appear magically at their desks in the morning. . . . If you add another 20 million square feet, 40 million square feet, how are they going to get here?

. . . Aren't those systems at capacity? Isn't that what this EIR tells you?"

REGIONAL IMPACTS

COMMENTS (Continued)

"On Page 72: 'Freeway and bridge capacity into downtown is essentially fixed at existing levels as major construction would be required to add new capacity. Current levels of vehicle traffic on the freeway and bridge system are at or near capacity'. . . . You jump in that sentence to say that there won't be any more cars coming in, because everyone is going to take transit. Please tell me where the transit capacity is going to come from. . . . What you are saying is that things are already so bad, we can't make it worse by continuing to approve projects. That is what this appendix says.

"I am also reminding you of an article from the San Francisco Examiner, September 15th, 'Consultant to Assess Impact on Downtown.' . . . This is Oakland. . . . They are doing a study to figure out how they are going to deal with it. They are doing a plan and an EIR. Please factor in the 18 million square feet in the Oakland redevelopment area in terms of what the regional demand is. ["San Francisco Examiner - September 15, 1982 - p]age B14. Consultant to assess impact on downtown. Oakland has allocated \$500,000 to evaluate the impact of new downtown construction. Cites 18 million square feet proposed within past year in downtown Oakland redevelopment area. Factor in the development planned in Oakland, since that development will clearly impact the ability of San Francisco to latch on to freeway, bridge, transit and regional housing capacity (not to mention air quality standards) to accommodate its development schemes.]

". . . the East Bay Express dated August 20th, 1982, gives a list of all of the projects in Oakland . . . All of those projects make demands on the freeway system, on BART. . . . You can't ignore Alameda, Contra Costa, Sonoma, Solano, Marin, [and] San Mateo counties. . . . Because they are all part and parcel of development pressures in the Bay Area that make demands on the same systems. ["East Bay Express - August 20, 1982 - pages 1 and 11. Cites difference in rental costs between San Francisco and East Bay as fueling the fires of development in Oakland. Lists buildings that will house 60,000 new workers. Oakland story above relates only to redevelopment area. This includes entire city. Relation to San Francisco - as above in Examiner story, but implications greatly multiplied.]

REGIONAL IMPACTS

COMMENTS (Continued)

"Maybe they don't make demands on the San Francisco water system, but they certainly affect San Francisco's ability to get rid of its garbage. . . .

"I would tell you two things from the Kaiser Center EIR. . . . I would refer to the Transpacific Centre cumulative impact analysis and the Kaiser Center cumulative impact analysis by reference. Please look at what is in here in terms of the cumulative development that is being analyzed in Oakland and also what they analyze. . . . If it does come to pass, AC Transit and BART isn't going to function. That's what's in here. They are planning on taking all of the capacity on BART to serve downtown Oakland in this EIR. . . . AC is a major factor in the ability of Oakland to develop, because a lot of BART only goes in a couple of directions. And Kaiser Center needs people from other places than around the BART line. ["Kaiser Center EIR - EE 81.71 - City of Oakland. This project alone would include 4.42 million square feet of commercial space. Please read and incorporate relevant material from traffic and transportation section, much of which deals with demands on regional freeway system (which runs through Oakland and other East Bay cities to get to Bay Bridge so people can get into San Francisco) and on BART and AC Transit. Cumulative impact analysis includes approved and proposed projects. Approved projects table, p. 68, includes 1,368,200 office and retail and 970 hotel rooms. Note the inclusion of retail and hotel space factored into traffic analysis. Proposed project list, p. 69, includes projects at various level of development of proposal and notes same. Total square feet - 14,705,000 in central business district. NOTE ALL ANALYSIS IN THIS EIR INCLUDES CUMULATIVE DEVELOPMENT LEVELS IF ALL PROPOSED PROJECTS WERE BUILT. Page 79 et seq. details problems with AC capacity and expansion. This information needs to be incorporated into SF EIRs along with information on demands that may be placed by East Bay development which may adversely impact ability of AC to move people into San Francisco. Page 82 et seq. - BART problems which will arise if cumulative development levels occur in East Bay. BART will be over capacity virtually throughout entire system. How would the juggling needed to accommodate East Bay affect the ability to juggle that same capacity to meet

REGIONAL IMPACTS

COMMENTS (Continued)

demands being placed by San Francisco? Air quality analysis - note use of vehicle miles traveled analysis to show impacts on air quality - something that should be in this EIR. Page 105 - increase in VMT would delay attainment of air quality goals. Since commute distances into San Francisco are presumably greater than commute distances into Oakland, would not the VMT analysis make even greater for SF the delay in attainment.

["TransPacific Centre EIR - EE81.78 - City of Oakland. Similar to Kaiser Center EIR in terms of issues and information."]

". . . The cumulative impact analysis here on traffic and transit and air quality needs to be evaluated by your staff, because . . . they are planning on taking all the freeway capacity through the Caldecott Tunnel to get into downtown Oakland here. Now, what about all the people that we're going to plan on housing east of that area? How are they going to get into San Francisco? And if Oakland creates a congestion problem such that the freeways and the transit system can't move and is at capacity level in the East Bay, and if the same thing happens in the North Bay and the same thing happens in the South Bay, it doesn't matter how much capacity we would like there to be, there won't be any because our people are going to come from the outlying areas. And you've got to have that in this EIR."

RESPONSE

The commenter notes that cumulative office development projected in other parts of the Bay Area may have impacts on transit, traffic, solid waste disposal and air quality. Whether, where, when and in what amounts such development may occur are dependent on a number of factors which are beyond the jurisdiction of San Francisco. Two such factors are 1) the exercise of zoning, planning and environmental review authority by other jurisdictions and 2) the rate of employment growth throughout the Bay Area.

REGIONAL IMPACTS

RESPONSE (Continued)

The following information is provided to describe the possible effects of cumulative office development throughout the Bay Area, and to explain the regional government structure that exists to address the issues of the effects of cumulative development.

San Francisco is the center of a nine-county region which has lesser activity nodes in each of the other counties comprising the region. Recognizing the interdependence of each part of the region, local jurisdictions have entrusted regional planning, and implementation of adopted policy measures where appropriate, to regional agencies. Responsibility for the comprehensive regional plan is vested in the Association of Bay Area Governments, the agency which forecasts regional growth. The Metropolitan Transportation Commission is responsible for coordinating regional transit and vehicular plans and policies. The Bay Area Air Quality Management District is responsible for maintaining and improving adherence to air quality standards. These and other regional agencies coordinate their planning and implementation activities on issues of mutual concern.

Long-range planning by the regional planning entities, and planning and implementation by operating agencies, has enabled the Bay Area to absorb the growth which has occurred between 1960 and 1981. The continued ability of the Bay Area to absorb growth is dependent upon the regional planning agencies, and operating agencies such as the Golden Gate Bridge, Highway and Transportation District, to anticipate and prepare acceptable policies for future regional needs, and upon the capability of the operating agencies to implement such policies.

Within this planning framework, development is proposed in each of nine counties in the region. Comprehensive plans for individual jurisdictions and large development proposals that are subject to environmental review under CEQA are also subject to review by the regional agencies. These agencies review specific proposals to determine the conformance of each to approved regional plans.

REGIONAL IMPACTS

RESPONSE (Continued)

Regional housing projections, prepared by ABAG, are presented on p. 143 of the Supplemental EIR. These housing projections and other ABAG projections of population and employment contained in Projections 79, (ABAG, 1979) are based on assumptions concerning demographic and economic trends, local land use policies, and transportation infrastructure. Between 1980 and 1990, total Bay Area population and employment is expected to increase by 564,500 and 314,700, respectively. According to Projections 79, San Francisco resident population is expected to decline by about 9,600 while employment in the City would increase by about 68,500.

The impact analysis in this report focuses upon capacity available within the 1982-1990 planning horizon. Decisions as to when major capacity increases in facilities serving the region will be needed are made by implementing and operating agencies in the context of planning done by regional agencies. (See also, responses under Infrastructure and Transit Capacity comments, pages 42-45 and 46-47.)

The amount of physical development that can be absorbed in the Bay Area is constrained by the rate and amount of economic growth. Physical development occurs in response to perceived demand for the type of structure to be built. If there is no perceived demand, physical development will not occur. For example, in the 1970's large shopping centers were proposed in San Mateo, Foster City and Redwood City. Only San Mateo's Fashion Island was built because that Peninsula area could only support one shopping facility.

Similarly market forces limit the amount of office space that can be occupied in the Bay Area during a given forecast period because the demand for office space is finite. If a large amount of speculative office space were to be built in Oakland, it would satisfy a portion of the regional demand. Then not all of the proposed office space in San Francisco would be built or, if it were built, it would not be fully occupied. The Supplemental EIR for the 135 Main Street project contains a worst-case analysis of cumulative development for downtown San Francisco because it assumes that all projects that are under formal review, approved, and under construction would be built and fully occupied.

REGIONAL IMPACTS

RESPONSE (Continued)

Employment growth will be distributed throughout the Bay Area where facilities to accommodate that growth -- including transit systems, infrastructure improvements, office space and housing -- exist, are used most efficiently, or are constructed. The amount of office space that can be occupied in the region during this decade is limited by many factors, particularly regional employment growth. Regional office development that exceeds the corresponding regional employment growth would be vacant.

The EIR does not state that there will be no more cars coming into San Francisco. Rather, on page 18 of the Supplemental EIR, the statement is made that the current number of single-occupant autos entering the city might be expected to decrease. This means that higher vehicle occupancies would be expected to occur, thus increasing the number of person-trips without increasing the number of vehicles. The total number of commuters who travel by auto would probably be maintained at least at existing levels and would most likely continue to increase.

The analyses in the Kaiser Center and Transpacific Centre EIRs are similar to the analysis used in this EIR in that only development in the project area is analyzed. In this EIR downtown San Francisco development is treated as cumulative and in the Oakland EIRs Oakland Central District development is similarly treated as cumulative. The ability of AC Transit to provide service to downtown San Francisco would be affected by development in the Oakland Central District only to the extent that AC might divert vehicles currently used on the transbay lines for use on downtown Oakland lines, rather than increase its capacity to serve both areas. This is because the AC transbay routes are express and semi-express routes that link East Bay residential areas with the Transbay Terminal in downtown San Francisco rather than the Oakland Central District. This Supplemental EIR has not assumed any increase in AC Transit transbay service nor has it assumed any decreases.

REGIONAL IMPACTS

RESPONSE (Continued)

The ability of BART to provide Transbay service is affected by development in the Oakland Central District as riders coming into Central Oakland from east of the Berkeley hills must use the same trains as San Francisco riders. (Riders on the Richmond and Fremont lines have service provided on routes which are separate from the San Francisco service.) Analysis of the cumulative peak-hour BART demand on the three BART lines serving downtown San Francisco, caused by Central Oakland development as reported in the Kaiser Center EIR, and from downtown San Francisco development, shows the following:

<u>Cordon Point</u>	(1982) <u>Existing Load Factor*</u>	<u>Future Load Factor**</u>
Transbay from Embarcadero		
Concord - Daly City	1.33	1.24
Richmond - Daly City	1.32	1.23
Fremont - Daly City	1.40	1.30
Northbound from MacArthur		
Concord - Daly City	1.36	1.69
Richmond - Daly City	1.22	1.44
Southbound from Lake Merritt		
Fremont - Daly City	1.36	1.29

* Load factor based upon (1982) existing seated capacity (72/car) as is done in the Kaiser Center EIR. This EIR in Table 3 bases the load factor on seated plus recommended standing capacity.

** Load factor based upon projected seated capacity from BART 5-year plan.

BART attempts to maintain a load factor of 1.30, i.e. 30% standees, but crush loading on a BART train is in the 1.70-2.00 load factor range. With the load factors projected above, BART plans for improvements to its system would enable BART to serve both the Central Oakland cumulative development and the downtown San Francisco cumulative development at the capacity levels projected for 1987.

REGIONAL IMPACTS

RESPONSE (Continued)

See, also, responses under Air Quality, Infrastructure, and Housing in this Response to Comments document.

Disposal of solid waste by San Francisco would not be adversely affected by cumulative development in downtown San Francisco and Central Oakland. Garbage disposal demands are affected by local and regional population growth factors and by changing technology, factors which are considered in regional planning by ABAG.

The projections in the Kaiser Center EIR that indicate development in the Oakland Central District would use whatever capacity remains at the Caldecott Tunnel during peak hours was made based upon assumptions about modal split that mirror the current high auto use into downtown Oakland. (Note that the Kaiser Center EIR projects a parking deficit of 4,900 spaces.)

Thus, if the projections of future auto travel to Oakland and San Francisco through the Caldecott Tunnel would exceed the capacity of the Tunnel, then a shift to higher vehicle occupancies or to transit might be expected. Auto travel from east of the Caldecott Tunnel to downtown Oakland or downtown San Francisco could potentially shift to BART. However, the current high level of auto demand at the Caldecott Tunnel would not be expected to decrease in the future. A shift to BART would add to the BART demand. However, as both the Oakland and San Francisco projections are based upon existing auto use and vehicle occupancy continuing into the future, projections of the actual demand at the Caldecott Tunnel cannot be derived from either of the analyses. Rather, the analyses can be interpreted to mean that existing trends will not be able to continue unchecked into the future and that congestion at the Caldecott Tunnel would reach a level that would force either a change in transportation mode (modal shift) or a change in employment or residence patterns.

AIR QUALITY

COMMENT

Sue Hestor: "I am going to submit to you again a letter that was submitted on the Citicorp Building by the Bay Area Air Quality Management District (BAAQMD) where they challenge the whole process that you go through on air quality. This letter is dated May 29th, 1981. . . . They are very concerned about the way the City is approaching air quality analysis and basically saying . . . the regional problem is not our problem. I am submitting that as though it were my comment. I don't know if Bay Area Air Quality is going to submit comments or has submitted comments on this one. But it affects the carbon monoxide counts. . . . How are the freeway corridors going to be affected by this level of cumulative impact? . . . All you have is street intersection measurements. To the extent that San Francisco is generating increased congestion on freeways, on freeways, you know, when the traffic slows down, the air quality goes down geometrically because you put out a lot more junk into the air if you are stop-and-go than if you are going fast. So there is nothing in here that factors in reduced speeds on freeways and bridges due to congestion. All we are looking at is this really microcosm of a couple of intersections in downtown and saying we're going to be okay.

["A letter from Bay Area Air Quality Management District, dated May 29, 1982...contained in the Final Citicorp EIR and raises questions that are still relevant about various alternatives, including locations closer to where people work, to reduce air pollution. In light of plans in San Mateo, Oakland, other east and north bay locations, perhaps San Francisco needs to confront the issue of where development should occur in the region to minimize air quality, traffic and transit impacts. Isn't that what the EIR process is supposed to be about anyway. The questions raised in that letter should be addressed."]

"Air quality is a regional problem. And to the extent that you are only factoring in new development in San Francisco and leaving out new development in the East Bay, leaving out new development along Highway 101, leaving out new development in the further north reaches of Marin County, you don't have an accurate picture of the air quality impacts of cumulative development in the Bay Area, and San Francisco is a major part of that."

AIR QUALITY

COMMENT (Continued)

["Note use of vehicle miles traveled analysis to show impacts on air quality (in the Kaiser Center EIR) -- something that should be in this EIR. Since commute distances into San Francisco are presumably greater than commute distances into Oakland, would not the VMT analysis make even greater for San Francisco the delay in attainment?"]

Commissioner Bierman: "Page 29. . . . I still think we are not getting a true picture of the accumulation downtown where the cars are stop-go, stop-go, waiting at stop lights for considerable periods of time. And where the readings are taken, we don't have that kind of condition. So I don't know that we are getting accurate information about air quality".

RESPONSE

The letter referred to by the commenter from the Bay Area Air Quality Management District concerning the One Sansome Building (Citicorp) contains the following statements. "We find the air quality analysis to be adequate -- as far as it goes and, perhaps, as far as can be expected for any single building proposal. . . . The concern we have about air quality impacts would apply to any building in downtown San Francisco and especially, the cumulative impacts of the many current and proposed large traffic-generating projects there. This concern goes beyond the ability to control of any one developer. It may be not meaningful in regard to current and future overall downtown planning in San Francisco. Carbon monoxide emission is the principal local problem.

"...We recognize that there are some positive air quality benefits to absorbing office building demand in a project of the design and location of the One Sansome Building. It is well served by MUNI and BART transit. The lack of provision of parking at the building may further motivate workers and visitors to use transit--thereby lessening reliance on the private automobile which would be more damaging to air quality.

AIR QUALITY

RESPONSE (Continued)

"Perhaps the question is one of city-wide and even regional balance. Absorption of office building demand in other places theoretically could reduce distances between home and work, and home and services, thereby reducing vehicular miles traveled and, consequently, emissions of CO, as well as hydrocarbons and nitrogen oxides, the precursors of ozone.

"Therefore we would like to recommend that future plans and projects be evaluated for their ability to approach or achieve minimum air quality degradation, relative to possible alternatives in intensity, design, services, and/or location."

The Bay Area Air Quality Management District has not commented on this Supplemental EIR.

In addition to including estimates of the carbon monoxide (CO) concentration at nearby street intersections, the air quality section of an EIR for a project in downtown San Francisco includes estimates of the amount of CO added to the Bay Area air by traffic caused by the project and by cumulative downtown development. In both cases, the effects of decreased vehicle speed due to traffic congestion is taken into account by assuming slower than normal vehicle speeds when calculating CO concentrations and emissions. For example, when calculating the total CO emissions of vehicles traveling to and from a project, an average speed of ten miles per hour is assumed when the vehicle is on a city street and a speed of 35 miles per hour is assumed when a vehicle is on a freeway. It is expected that emissions given off by real traffic flows under all but the most extreme stop-and-go conditions (which occur when accidents block travel lanes) will be accurately estimated by this technique.

The Supplemental EIR contains information not only on the project and cumulative development as defined, but upon their relationship to the total air quality. The project transportation totals shown in Table 6, page 30, are based on vehicle miles traveled derived from the traffic data used in the EIR. Regional totals, as shown, are based on the most current calculations and projections made by the regional agencies identified in the table.

AIR QUALITY

RESPONSE (Continued)

The estimates of future air quality, contained in the 1982 Bay Area Air Quality Plan, prepared by ABAG, BAAQMD, and MTC, were based on projected regional population, employment and land use trends. Despite projected regional increases in population, vehicle use, and the density of development in urban areas, attainment of state and federal carbon monoxide and ozone standards is forecast for 1987, now that a motor vehicle inspection and maintenance program has been adopted by the State legislature.

As noted in the BAAQMD letter cited by Ms. Hestor, the concern expressed "may be most meaningful in regard to current and future overall downtown planning." San Francisco is conducting a downtown planning study and Oakland is about to conduct a Central District planning study to update current plans in the context of changes which have occurred in the past decade and which are foreseen. Also reflecting change is the 1982 Bay Area Air Quality Plan which replaces the 1979 Air Quality Plan. The 1982 Air Quality Plan identifies three locales in the Bay Area where carbon monoxide is a problem and prescribes specific control strategies. The locations are Oakland, Vallejo, and San Jose. San Francisco is not included as an area of special concern.

ENERGY

COMMENT

Commissioner Bierman: "Page 31, talking about energy and PG&E and how they are going to handle things. Recently in the paper there has been a lot about . . . the State of Washington . . . particularly Washington nuclear power -- not being available because they aren't going to be able to complete their plans. . . . They are facing bankruptcies. . . . Rancho Seco, and I don't know the name of the plant in Southern California, are on the list of the 'most likely to be dangerous' plants in the country. There are 14 or 15 of them. Can PG&E provide the energy for these highrises if they don't have that source available to them?"

RESPONSE

Electricity requirements for approved and proposed development in downtown San Francisco represent about 0.4% of total electricity requirements in PG&E's service area. The cumulative increase in electricity consumption by these projects would account for about 13% of PG&E's projected systemwide increase over the next 10 years.

PG&E's reserve margin, a measure of excess capacity over demand, or "freeboard", was 20% in 1981. The reserve margin is expected to be about 14% in 1982, increasing to about 25% in 1983 and remaining at about 20% through 1990. Pacific Northwest imports/1/ comprised about 7.5 % of total PG&E resources in 1981; projections for 1982 and beyond assume Pacific Northwest imports will be able to provide about 5% of PG&E's systemwide electrical capacity in 1981; projections for 1983 and beyond assume that Rancho Seco and Diablo Canyon will be able to provide about 15% of the PG&E system capacity. Imports from other utilities in California, including the San Onofre nuclear power plant, were about 14% of total capacity in 1981, but PG&E projections indicate no imports from Southern California in the future. PG&E also has plans to increase cogeneration, geothermal, wind, and hydro sources of power in the next 20 years. Thus, PG&E's reserve margin is adequate to allow for reasonably foreseeable interruptions of supply from these sources.

ENERGY

NOTE

/1/ Imports are made from the Pacific Northwest because of the lower cost of such power than some other sources, due to a power surplus in the Pacific Northwest.

MITIGATION

COMMENTS

Sue Hestor: ". . . Take every mitigation measure that you certified in your Planning Commission resolution that approved the project, and tell me how much of what it is mitigating. You have all of your little things -- eyebolts. I want to know how much an eyebolt mitigates. And what does an eye bolt mitigate? An eyebolt probably should be a condition on the permit, but I don't see that it mitigates anything?"

". . . How much does a bicycle rack mitigate? I think it should be a condition, but how much does it mitigate?

". . . Resolution 9357 is the approval resolution for this project. . . . Please tell us how they [each mitigation measure] are, what they are mitigating and how much. . . . That comment was made May 22nd, 1981, by CalTrans in comments that came in on Citicorp. . . . [The specific point that I would also like to stress is: 'The listed mitigation measures have not clearly been evaluated for their own environmental effects and there is no evaluation of the effectiveness of the measures to assure a reasonable service level or even to maintain the levels that now exist.'] Tell us, mitigation by mitigation, how you are mitigating the traffic, transportation, air quality impacts. . . . I am sure CalTrans, at least the person who submitted that comment, has the same concerns on this one, because it's the same problem."

["I hereby ask specifically that the Commission's findings on page 2 that specific mitigation measures will mitigate significant effects on traffic and pedestrian use of adjoining streets, on transit use and transit and parking demand in the downtown area, and on housing demand. Please specify item by item what effects are being mitigated by each time, quantify the amount of mitigation and analyze the impacts of the mitigation measure on the environment...(see Caltrans letter above)."]

["For example, what does it mean, "project sponsor will cooperate in mitigating cumulative impacts on pedestrian traffic flow?"]

MITIGATION

COMMENTS (Continued)

["SFRG and the MUNI asked that a requirement for funding for MUNI that is not conditioned on legislation or successful litigation be imposed. This has not been required. Is this within the jurisdiction of another City agency? It is infeasible - where is the information?]

["Please document the need for further strengthening of the C-3-0 district as a compact center for financial, technical, professional and administrative services. Is it currently weak in that area? Will the area continue to be 'strengthened' even if it collapses under its own weight in the areas of traffic, transit, pedestrians, bridge capacity - which findings are made elsewhere in the resolution, and certainly in the information available in the EIR which talks about extended rush hours, cars unable to come into the city because capacity reached, MUNI way over capacity. IS THIS STRENGTHENING DOWNTOWN BY BRINGING THE SYSTEMS TO A NEAR COLLAPSE?]

["Please tell me what is the urban garden.]

["Is the effect of the transit broker - presuming it is successful in taking people out of their cars and onto transit or pools - factored already into the transportation analysis, or will the impacts be increased if this and every other transportation broker is successful?"]

RESPONSE

The mitigation measures which may be contained in any resolution the City Planning Commission may adopt approving this project are not known at this time. Although, typically, conditions imposed by the City Planning Commission are based in part on mitigation measures identified in the EIR, other measures may be included for planning or other purposes. This response is limited to those mitigation measures which are set forth in the EIR. Many of the mitigation measures are qualitative rather than quantitative and cannot be quantified.

MITIGATION

RESPONSE (Continued)

The Caltrans reference to mitigation measures in the One Sansome Building EIR, certified August 6, 1981, pertains to specific transportation mitigation measures in that report, such as the closing of Sansome Street which are not pertinent to or proposed for this project. No comment has been made by Caltrans on mitigation measures in this report. The general concern of the Caltrans comment is treated in the remainder of this response.

The inclusion of a link in a publicly accessible mid-block pedestrian walkway would comply with a plan requested by the Department of City Planning for such a privately developed amenity which would increase pedestrian capacity through the block. The project would provide approximately one-fifth of a total system in the block.

The removal of old sidewalk elevators would clear the sidewalk area of the barrier effect caused when such elevators were in use, thus increasing effective sidewalk capacity. Calculated sidewalk capacities were based on the assumption that such barriers would be removed.

Provision of an entrance courtyard at the front of the project and a rear ("urban") garden at the mid-block walkway would provide visual amenities and passive recreational areas for project occupants and the public.

The height of the building was established to provide a transition from higher to lower buildings in accordance with the urban design objectives of the Urban Design Element of the Master Plan in consultation with the project review staff of the Department of City Planning.

The mitigation measure for historical and cultural resources provides for procedures to be followed in the event that such resources were encountered during project construction and would serve to preserve or recover such resources.

MITIGATION

RESPONSE (Continued)

Under Employment, Housing and Fiscal Factors, the FEIR states that the project sponsor would provide for 231 dwelling units or equivalent credits under prevailing formulas used by the Department of City Planning and the Mayor's Office of Community Development. This mitigation measure would substantially mitigate the project's impact on the San Francisco housing market.

In this same section, a mitigation measure is suggested that would have the project sponsor contribute funds for transit improvement in proportion to the project's transit demand, in accordance with whatever measure is adopted by the Board of Supervisors. This measure would mitigate transit impacts in proportion to how the funds are used to improve transit.

The traffic mitigation measures suggested by the 135 Main Street FEIR (pages 116-117) and incorporated in Resolution 9357 are all Transportation System Management (TSM) measures. Many of these measures are included in the BAAQMD Bay Area Air Quality Plan, 1982, to reduce both hydrocarbon and carbon monoxide emissions regionwide. The TSM measures identified are aimed at reducing peak-hour vehicle volumes by encouraging other modes of travel (such as mass transit as opposed to single-occupant autos), greater vehicle occupancies, and travel at periods other than peak periods. The effectiveness of the TSM incentive measures (providing bicycle facilities, vanpool/carpool information and regulating parking rates to discourage all-day parking) depends upon individual private choices about the perceived convenience of each of these modes to each commuter from day to day. Perceived convenience includes factors such as cost, schedule flexibility, travel time, and the proximity of the travel route endpoints to origins and destinations. Choices can vary greatly from traveler to traveler and from place to place; accurate regional projections of the effectiveness of increasing the attractiveness of some of these choices cannot be made reliably. An employer's ability to implement staggered shifts or flextime depends on the size and nature of the firm. For example, small firms or service-sector firms would have less

MITIGATION

RESPONSE (Continued)

schedule flexibility than large firms or production-sector firms. For these reasons, any attempt to quantify the effectiveness of proposed TSM measures in removing vehicles from streets (and thus improving air quality) in the downtown would be highly speculative.

The mitigation measures pertaining to Mission Street intersections, if adopted by the City, would improve the flow of traffic, including transit vehicles. See also the discussion under Intersection Traffic.

The role of the transportation broker is to make alternate commute information available and easily accessible. The effectiveness of a transportation broker would be constrained by the physical limits of the transportation system in that a broker could not force individual commuters onto transit lines in excess of capacity. However, within the overall population of single-occupant auto commuters is a sub-group of commuters that would use a higher-occupancy mode if they were made aware of the availability of alternate modes, or if the frustration of trying to arrange alternate modes were decreased considerably. The effect of transportation broker has not been included in the transportation analysis. Thus, any increase in carpool, vanpool, bicycle, or transit uses effected by the transportation broker would reduce traffic and air quality effects.

The eyebolt measure has been included in response to Resolution No. 81-0098 of the Public Utilities Commission which states that "it is more economical and frequently less visually obtrusive to employ eyebolts fastened to the sides of buildings to support trolley wire" and that "the process for obtaining permission to install eyebolts is often slow, cumbersome, and uncertain." The resolution, therefore, requests the City Planning Commission to "require that all new structures suitable for supporting eyebolts for trolley wire on existing or proposed trolley coach or light rail routes be constructed with eyebolts installed or with provisions for direct attachment of eyebolts. This would mitigate the procedural difficulties encountered by Muni in negotiating

MITIGATION

RESPONSE (Continued)

for the use of existing building facades to support trolley wires." Such difficulties could delay the use of electric trolley vehicles which have less impact on the noise and air environment, and may save energy under San Francisco's electric supply system.

The provision of bicycle racks provides parking for bicycles which facilitate and encourages their use, thus reducing the pressure on more crowded transportation modes.

Measures on page 118 would limit, control, or minimize noise caused by construction of the project. Measures on page 119 of the FEIR would assure proper internal air quality for users of the project and would provide for efficient use of energy required to operate the project. Measures on page 121 provide for the safety of adjoining buildings during construction and of project users during occupancy of the project.

The Commerce and Industry Element of San Francisco's Comprehensive Plan includes as one of its important policies the strengthening of the downtown business district. The C-3-0 zoning of this area, and the project site, is in conformance with this objective. ABAG's Projections '79 indicate that substantial additional office space will be required in San Francisco to accommodate projected employment growth. If that office space is not constructed, jobs will be forced out of San Francisco.

As the discussions under Muni Costs and Regional Impacts state, the various transit operating agencies project service expansion to meet the demand of cumulative growth.

STAFF-INITIATED TEXT CHANGE

The following is added to the text on page 36 of the Supplemental EIR.

G. THE PROJECT WITH NO PARKING

(This statement is added to the description of this alternative on page 131 of the EIR.)

"This alternative was rejected by the project sponsor because it would not substantially reduce or avoid environmental effects of the proposed project. In addition, the sponsor believes that some parking is necessary to provide service to visitors, workers, and handicapped persons who would use the building."

IX. EIR AUTHORS AND CONSULTANTS; ORGANIZATIONS AND PERSONS CONSULTED

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Gail Bloom

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206 City Hall
San Francisco, CA 94102
Alice Suet Yee Barkley

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San Francisco Municipal Railway
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San Francisco, CA 94115

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Oakland, CA 94607

- Jim Davidson, Senior Civil Engineer,
Generation Planning
Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94404
- Marty Birkenthal, Transportation Planner
Bay Area Rapid Transit District
800 Madison Street
Oakland, CA 94607
- Gregory Kipp, Transportation Planner
San Mateo County Transit District
400 South El Camino Real
San Mateo, CA 94402
- Ted Reynolds, Senior Planner
Alameda - Contra Costa Transit District
508 16th Street
Oakland, CA 94612
- Alan Zahradnik, Senior Planner
Golden Gate Bridge, Highway
& Transportation District
P.O. Box 9000, Presidio Station
San Francisco, CA 94129
- Jim Strong, Design Engineer
Southern Pacific Transportation Company
One Market Plaza
San Francisco, CA 94105

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San Francisco, California 94119
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Berkeley, California 94705

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Bay Area Rapid Transit District
800 Madison Street
Oakland, CA 94607

Golden Gate Bridge, Highway
& Transportation District
P.O. Box 9000, Presidio Station
San Francisco, California 94129

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Hotel Claremont
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San Mateo, California 94402

Alameda-Contra Costa Transit
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Oakland, California 94612

CITY AND COUNTY OF SAN FRANCISCO

City Planning Commission
450 McAllister Street
San Francisco, CA 94102

Toby Rosenblatt, President
Yoshio Nakashima, Vice President
Susan Bierman
Jerome Klein
C. Mackey Salazar
Eugene Kelleher, Alternate
for Richard Sklar
Norman Karasick, Alternate
for Roger Boas

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Board
450 McAllister Street
San Francisco, CA 94102
Attn: Jonathan Malone, Secretary

Water Department
Distribution Divisions
425 Mason Street
San Francisco, California 94102
Attn: George Nakagaki, Manager

San Francisco Fire Department
260 Golden Gate Avenue
San Francisco, California 94102
Attn: Joseph Sullivan, Chief
of Special Services

San Francisco Department of
Public Works
Traffic Engineering Division
460 McAllister Street
San Francisco, California 94102
Attn: Scott Shoaf

San Francisco Department of
Public Works
Mechanical Section
45 Hyde Street, #222
San Francisco, California 94102
Attn: Ray G. Danehy

Bureau of Building Inspection
450 McAllister Street
San Francisco, California 94102
Attn: Robert Levy
Superintendent

San Francisco Committee for Utility
Liaison on Construction and
Other Projects (CULCOP)
363 City Hall
San Francisco, California 94102

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949 Presidio Avenue, #204
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Attn: Peter Straus

Economic Development Council
480 McAllister Street
San Francisco, California 94102
Attn: Richard Goblirsch

Public Utilities Commission
Bureau of Energy Conservation
949 Presidio Avenue
San Francisco, California 94115
Attn: Flint Nelson, Director

San Francisco Public Utilities Commission
287 City Hall
San Francisco, CA 94102

San Francisco Real Estate Department
450 McAllister Street Room 600
San Francisco, CA 94102
Attn: Wallace Wortman,
Director of Property

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San Francisco Chapter
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San Francisco, California 94102

Bay Area Council
348 World Trade Center
San Francisco, California 94111

Building Owners and Managers
Association
690 Market Street
San Francisco, California 94104
Attn: Elmer Johnson

Building Service Employees Union
Local 87
240 Golden Gate Avenue
San Francisco, California 94102

Charles Hall Page and Associates
364 Bush Street
San Francisco, California 94104

Downtown Senior Social Services
295 Eddy Street
San Francisco, California 94102

Downtown Association
582 Market Street
San Francisco, California 94104
Attn: Lloyd Pfleuger, Manager

Environmental Impact Planning Corp.
319 Eleventh Street
San Francisco, California 94103

The Foundation for San Francisco's
Architectural Heritage
2007 Franklin Street
San Francisco, California 94109
Attn: H. Grant Dehart
Executive Director

Friends of the Earth
124 Spear Street
San Francisco, California 94105
Attn: Connie Parrish

Charles T. Gill
315 Ivy Street
San Francisco, California 94102

Gray Panthers
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San Francisco, California 94102
Attn: W. Nunnally

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San Francisco, California 94114

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San Francisco, California 94108

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San Francisco, California 94116

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San Francisco, California 94108

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Construction Trades Council
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San Francisco, California 94110
Attn: Stanley Smith

San Francisco Chamber of Commerce
465 California Street
San Francisco, California 94104
Attn: Richard Morten

San Francisco Ecology Center
13 Columbus Avenue
San Francisco, California 94111

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3068 - 16th Street
San Francisco, California 94103
Attn: Bernard Speckman

San Francisco Planning and Urban
Research Association
312 Sutter Street
San Francisco, California 94108

San Francisco Convention and
Visitors Bureau
1390 Market Street, Suite 260
San Francisco, California 94102
Attn: George Kirkland
Executive Director

San Francisco Tomorrow
88 First Street, # 600
San Francisco, California 94105

San Franciscans for Reasonable
Growth
88 First Street #600
San Francisco, California 94105

San Francisco Retail Merchants Association
582 Market Street, Suite 1001
San Francisco, California 94104

John Sanger & Associates
2340 Market Street
San Francisco, California 94114

Senior Escort Program
South of Market Branch
814 Mission Street
San Francisco, California 94103
Attn: Neighborhood Coordinator

Sierra Club
530 Bush Street
San Francisco, California 94105
Attn: Becky Evans

Kent E. Soule
1180 Filbert Street, #204
San Francisco, California 94109

Tenant & Owners Development
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177 Jessie Street
San Francisco, California 94105
Attn: John Elberling

Paul Thayer
1033 Stanyan Street
San Francisco, California 94117

Tosta, Browning & Cincotta
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San Francisco, California 94105
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899 Pine Street, #1610
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220 Sansome Street
San Francisco, CA 94104

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San Francisco, California 94105
Attn: Jean Circiello

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San Francisco, California 94105

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San Francisco, California 94102

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Center
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Institute of Governmental Studies
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Berkeley, California 94720

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San Francisco, California 94132

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San Francisco, California 94110
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San Francisco Chronicle
925 Mission Street
San Francisco, California 94103
Attn: Marshall Kilduff

San Francisco Examiner
110 Fifth Street
San Francisco, California 94105
Attn: Gerald Adams

San Francisco Progress
851 Howard Street
San Francisco, California 94103

The Sun Reporter
1366 Turk Street
San Francisco, California 94115

XI. CERTIFICATION RESOLUTION

SAN FRANCISCO
CITY PLANNING COMMISSION
AMENDED RESOLUTION NO. 9356

WHEREAS, The City Planning Commission on March 25, 1982, CERTIFIED THE COMPLETION of the final environmental impact report concerning EE81.61, the 135 Main Street Office Building; and

WHEREAS, A lawsuit was filed by San Franciscans for Reasonable Growth ("SFRG") challenging the City Planning Commission's action in adopting Resolution No. 9356 certifying the final environmental impact report concerning EE81.61, the 135 Main Street Office Building; and

WHEREAS, The California Superior Court for the City and County of San Francisco has remanded this matter to the Commission in order that the Commission may reconsider Resolution 9356 and in particular its findings regarding the cumulative impacts of downtown development and its findings regarding air quality; and

WHEREAS, The City Planning Commission has fully reconsidered these matters and has considered the Supplement to the final environmental impact report for the 135 Main Street project;

THEREFORE BE IT RESOLVED, That the City Planning Commission hereby adopts the following Amended Resolution No. 9356:

XI. Certification Resolution

WHEREAS, A draft environmental impact report, dated December 18, 1982, a final environmental impact report, dated March 25, 1982, and a Supplement to the final environmental impact report, dated November 30, 1982, have been prepared by the Department of City Planning in connection with EE81.61:

135 Main Office Building;

Construction 18,906.25 square foot lot a 22-story, 340-foot high office building with 264,687 square feet of floor area, ground floor retail space and subsurface parking for 22 cars after demolition of two brick commercial structures; requiring discretionary review, on the property described as follows:

135 Main Street, Lots 12 and 13 in Assessor's Block 3717.

WHEREAS, The Department duly filed a notice of completion of the draft, and draft supplemental reports with the Secretary of the California Resources Agency, gave other notice and requested comments as required by law on the draft report and the supplement, and made the draft report and supplement available to the general public and satisfied other procedural requirements; and

WHEREAS, The City Planning Commission held a duly advertised public hearing on said draft environmental impact report on January 21, 1982, and a duly advertised public hearing on said draft Supplement on October 7, 1982, at which opportunity was given for public participation and comments; and

WHEREAS, A final environmental impact report, and final supplement have been prepared by the Department, based upon the draft environmental impact report, draft Supplement, any consultations and comments received during the review process, any additional information that became available, and a response to any comments that raised significant points concerning effects on the environment, all as required by law; and

XI. Certification Resolution

WHEREAS, On November 10, 1982, the Commission received the final environmental impact report as supplemented by the final supplement to the environmental impact report. On November 30, 1982, the Commission found that the contents of said report as supplemented by the final supplement and the procedures through which the final environmental report and supplement were prepared, publicized and reviewed comply with the provisions of the California Environmental Quality Act, the Guidelines of the Secretary for Resources and San Francisco requirements;

THEREFORE BE IT RESOLVED, That the City Planning Commission does hereby find that the final environmental impact report, as supplemented by the supplement to the EIR, dated November 30, 1982, concerning EE81.61: 135 Main Street Office Building is adequate, accurate and objective, and does hereby CERTIFY THE COMPLETION of said final environmental impact report and supplement in compliance with the California Environmental Quality Act and the State Guidelines;

AND BE IT FURTHER RESOLVED, That the Commission in certifying the completion of said final environmental impact report and supplement does hereby find that the project as proposed will have a significant effect on the environment. The project will create a demand for about 230 dwelling units in San Francisco as well as for housing outside San Francisco and for parking, will increase transit impacts, will increase energy consumption, will obstruct some views from nearby buildings, and will shade some portions of Mission and Main Streets;

AND BE IT FURTHER RESOLVED, That the Commission has specifically reconsidered its findings regarding the cumulative impacts of reasonably foreseeable downtown development in light of the supplement to the EIR as well as the information previously before it, and hereby finds that the proposed project, as indicated by the EIR, will contribute to cumulative

XI. Certification Resolution

impacts on transit, pedestrian and vehicular traffic, energy consumption, and parking and housing demand produced by said cumulative downtown development;

AND BE IT FURTHER RESOLVED, That the Commission has specifically reconsidered its findings regarding air quality in light of the supplement to the EIR as well as the information previously before it, and hereby finds that the proposed project would not have a significant impact on air quality or on frequency of violations of air quality standards, nor would reasonably foreseeable cumulative development in the downtown area have a significant impact on air quality or result in significantly increased frequency of violations of air quality standards under the Bay Area Air Quality Plan. The policies of the Transportation Element as amended of the San Francisco Master Plan to discourage use of private automobiles and promote increased use of transit will further improve air quality:

I hereby certify that the foregoing Resolution was ADOPTED by the City Planning Commission at its special meeting of November 30, 1982.

Lee Woods, Jr.
Secretary

AYES: Commissioners Karasick, Kelleher, Klein, Rosenblatt

NOES: Commissioner Bierman

ABSENT: Commissioners Nakashima, Salazar

PASSED: November 30, 1982

XI. Certification Resolution

XII. APPENDICES

A. COURT ORDER

Memorandum of Interlocutory Decision and Order
Writ of Mandamus
Interlocutory Judgement

COPY

APPENDIX A - COURT ORDERS

FILED
San Francisco County Superior Court

JUL 22 1982

CARL M. OLSEN, Clerk

By R. TAKEI
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

SAN FRANCISCANS FOR REASONABLE
GROWTH,

Petitioner,

v.

CITY AND COUNTY OF SAN FRANCISCO;
PLANNING COMMISSION OF THE CITY
AND COUNTY OF SAN FRANCISCO;
DEPARTMENT OF CITY PLANNING OF
THE CITY AND COUNTY OF SAN
FRANCISCO; and DOES I-XX,
inclusive,

Respondents.

NORLAND PROPERTIES, and DOES
XXI-XL, inclusive,

Real Party in Interest.

NO. 794474

MEMORANDUM OF
INTERLOCUTORY
DECISION AND ORDER

CALENDARED
BY HEINEMANN

JUL 28 1982

FOR DATE(S) _____

The Amended Petition for Writ of Mandamus came on
for hearing in the above entitled Court on July 15 and
July 16, 1982. For purposes of hearing only, the matter was
consolidated with similar actions pending before this Court
in Civil Actions Numbers 791 326, 791 327, 792 552, and 793 064.

1 Appearing for petitioners were Sue C. Hestor, Esq. and
2 Richard B. Satz, Esq. Appearing for respondents City and
3 County of San Francisco ("the City"), and the San Francisco
4 City Planning Commission was George Agnost, City Attorney,
5 through Alice Suet Yee Barkley, Deputy City Attorney.

6 Appearing for real party in interest Norland Properties were
7 Charles R. Farrar, Jr., Esq. and Penelope A. Prevolos, Esq.

8 The Amended Petition for Writ of Mandamus contains
9 seven causes of action. Each of these seeks a directive from
10 this Court requiring respondents to set aside their approval
11 authorizing the construction of a high-rise office building
12 located at 135 Main Street in San Francisco ("the project").
13 Approval of the project was granted by the respondent
14 Planning Commission on March 25, 1982, pursuant to Resolution
15 Number 9357 (A.R.II B, No. 17). Prior to the adoption of
16 that resolution, respondent Planning Commission, also on
17 March 25, 1982 had adopted Resolution Number 9356 (A.R.II B,
18 No. 17), certifying the completion of the final Environmental
19 Impact Report with respect to the Project in compliance with
20 the California Environmental Quality Act and State Guidelines
21 with respect thereto.

22 The seven causes of action in the Amended Petition
23 are:

24 1. First, that respondents abused their
25 discretion by approving an EIR for the project when they
26 lacked sufficient information on the impacts of cumulative
27 downtown development (Amended Petition at 1);

1 2. Second, that respondents abused their
2 discretion in approving the EIR for the project when the
3 construction of the project will prevent an adequate analysis
4 of the cumulative impacts in the Downtown EIR and adversely
5 affect the Downtown EIR (Amended Petition at 14);

6 3. Third, that respondents abused their
7 discretion by certifying the EIR for the project and
8 approving the project when construction of the project may
9 prevent implementation of mitigation measures the Downtown
10 EIR might develop (Amended Petition at 19);

11 4. Fourth, that the EIR for the project is
12 inadequate in that it was an unreasonably low estimate of
13 probable future projects as the basis for computing
14 cumulative impacts (Amended Petition at 21);

15 5. Fifth, that respondents abused their
16 discretion in approving the project without requiring
17 adequate mitigation of significant adverse environmental
18 impacts (Amended Petition at 23);

19 6. Sixth, that respondents abused their
20 discretion by approving the project at a time when the City
21 did not have a legally complete master plan (Amended Petition
22 at 27); and

23 7. Seventh, that respondents abused their
24 discretion by failing to adequately respond to comments on
25 the draft EIR (Amended Petition at 30).

26
27
28

1 The sixth cause of action asserts that the approval
2 must be rendered invalid by reason of the alleged failure of
3 respondents to bring the City's Housing Element of its Master
4 Plan into conformity with the requirements of Article 10.6
5 (Section 65580 et seq) of the Government Code. Those allega-
6 tions are properly tried in ordinary mandate under Code of
7 Civil Procedure § 1085. All other causes of action are
8 properly tried pursuant to Code of Civil Procedure § 1094.5
9 and Public Resources Code § 21168.

10 The Court has reviewed the administrative record
11 (as supplemented by petitioner during this proceeding) in its
12 entirety. The Court has also considered the extensive
13 Memoranda and arguments presented by counsel for the parties.
14 The Court, having reviewed the authorities and being fully
15 informed with respect to the issues and arguments, now makes
16 the following decisions and conclusions.

17 CONCLUSIONS

18 1. The Project is a "housing related project"
19 within the meaning of Government Code 65587.1(b).
20 Accordingly, the relief sought by petitioner in its sixth
21 cause of action is expressly barred by that Section which
22 provides in part:

23 Notwithstanding any other provision
24 of law, . . . a local approval, made
25 prior to May 1st, 1983, of a housing
26 related project shall not be invalidated
27 due to the failure or alleged failure of
28 a City and County to comply with this
article, subdivision (c) of
Section 65302 of the Government Code, or
any regulations or guidelines adopted
pursuant thereto, or any other provision
of law requiring or claimed to require

1 consistency with the housing element of
2 the local plan. Government Code
3 Section 65587.1(b) (Emphasis added.)

4 Petitioner's contention that section 65587.1 is void because
5 it applies special legislation to the detriment of a particu-
6 lar class is without merit. In view of that section, it was
7 not necessary for the Court to decide any of the other
8 arguments or defenses asserted by respondents and real party
9 in interest to petitioner's sixth cause of action.

10 2. Petitioner's first, second, and third causes
11 of action are founded on petitioner's assertion that the
12 project approval must be rendered invalid by reason of
13 respondents' failure to complete and consider information to
14 be developed by and contained in the program EIR authorized
15 by respondent Planning Commission under its Resolutions
16 Numbers 8474, 8480, 8521, 8730, 8735, 8791, 8990, and 8979
17 ("the Downtown EIR"). The Downtown EIR was designed to
18 examine and evaluate various alternatives to downtown zoning
19 proposals in a focused environmental impact report. Its
20 purpose, among others, was to evaluate the potential environ-
21 mental impacts of such zoning proposals and to present for
22 public review a set of comprehensive and final revisions to
23 relevant sections of the City Planning Code. Nothing in the
24 California Environmental Quality Act, the State Guidelines,
25 the Government Code, the San Francisco City Charter, the
26 San Francisco Administrative Code, or the case law supports
27 petitioner's position that the pendency of a program EIR such
28 as the Downtown EIR herein disables respondents from acting

1 upon and/or approving and certifying individual project EIRs
2 pending completion of the program EIR or from approving such
3 projects. Accordingly, the relief sought in petitioner's
4 first, second and third causes of action must be denied.

5 3. There is substantial evidence in the record to
6 support each of the findings contained in respondent Planning
7 Commission's Resolution Number 9356 certifying the completion
8 of Final Environmental Impact Report and in Resolution
9 Number 9357 approving the project, except in the following
10 respects:

11 A. Cumulative Impacts. The EIR evaluated
12 cumulative environmental impacts related to the proposed
13 project and other similar projects (Guidelines § 15023.5) on
14 the basis of the approximately 2.6 million square feet of new
15 office space under construction, approved for construction or
16 proposed within an approximate two block radius of the
17 proposed Norland project. The Commission did not explain its
18 decision to limit analysis of cumulative impacts in the EIR
19 to those cumulative impacts resulting from the 2.6 million
20 square feet of development in the two block area around the
21 Norland project, rather than including in the analysis the
22 entire downtown commercial district (C-3) as has been the
23 practice of prior EIRs certified by the Commission; and

24 B. Air Quality. The Commission did not
25 adequately explain its finding in the EIR and in Resolution
26 No. 9357 that the project would not contribute to significant
27 cumulative impacts on air quality.

28

1 4. For the reasons set forth in paragraph 3
2 above, the relief sought in petitioner's fourth and fifth
3 causes of action is granted to the extent set forth in this
4 Court's Order herein, and the relief sought in petitioner's
5 seventh cause of action is denied.

6 ORDER

7 GOOD CAUSE APPEARING, it is hereby ordered, adjudged
8 and decreed that:

9 1. Pursuant to Code of Civil Procedure § 1094.5(f),
10 this Court orders the Planning Commission to reconsider its
11 prior resolutions certifying the EIR and approving the
12 proposed project, and remands the EIR and proposed project to
13 the Planning Commission for further consideration of the
14 matters set forth in paragraphs 3(A) and (B) of the Conclu-
15 sions set forth above.

16 2. On remand, the Planning Commission shall
17 undertake such further proceedings as it deems appropriate
18 and consistent with this Order.

19 3. The Court finds and determines that the
20 following procedures would be consistent with this Order:

21 A. The Commission may cause to be prepared a
22 Supplement to the EIR ("Supplemental EIR") which shall
23 address the matters set forth in paragraphs 3(A) and (B) of
24 this Court's Conclusions hereinabove, in accordance with the
25 procedures contained in the Guidelines, applicable to supple-
26 ments to environmental impact reports, most specifically
27 §§ 15067.5, and 15085(d).

1 B. Upon completion and certification of the
2 Supplemental EIR, the Planning Commission may reconsider the
3 proposed project in light of the EIR and Supplemental EIR,
4 and may adopt such findings and mitigation measures as it
5 deems proper and within its lawful discretion, and may
6 approve the proposed project with such conditions as it deems
7 proper and within its lawful discretion.

8 C. The City may allow any person objecting
9 to any approval or disapproval of the proposed project after
10 reconsideration by the Planning Commission to appeal such
11 determination to the Board of Permit Appeals within ten (10)
12 days after the later to occur of (1) adoption of a resolution
13 approving or disapproving the proposed project or (2) posting
14 of a notice advising of the adoption of such a resolution and
15 stating the right of any person so interested to appeal said
16 resolution and determination to the Board of Permit Appeals,
17 such posting to be at the place and in the manner provided in
18 the Administrative Code and Municipal Code of the City and
19 County of San Francisco for the posting of notice of issuance
20 of a site or building permit.

21 D. Any such appeal shall be conducted in
22 accordance with applicable provisions of law, including
23 specifically the Charter of the City and County of
24 San Francisco, the Administrative Code of the City and County
25 of San Francisco and the Rules of the Board of Permit Appeals.

26 4. This Order shall not be construed to prohibit
27 or limit the exercise by the Planning Commission of its
28 lawful jurisdiction and discretion to cause to be prepared,

1 or to certify or not to certify the Supplemental EIR, to
2 adopt or not to adopt proposed mitigation measures or pro-
3 posed findings of overriding considerations, or to approve or
4 not to approve the proposed project.

5 5. This Court retains jurisdiction over the
6 subject matter of this action, and all proceedings relating
7 to the proposed project. Any objection to the certification
8 of a Supplemental EIR prepared pursuant to paragraph 2 or 3
9 of this Order, or approval by the Commission of the proposed
10 project based in part thereon, shall be made within thirty (30)
11 days after the filing of a Notice of Determination based on
12 such certification and approval pursuant to Public Resources
13 Code § 21152, as would otherwise be required under Public
14 Resources Code § 21167 for the institution of an action
15 challenging such a certification and approval. Any other
16 objections to any action taken by the Planning Commission or
17 Board of Permit Appeals pursuant to this Order shall be
18 presented to this Court for any such relief as is proper
19 within fifteen (15) days after the action or inaction of the
20 Planning Commission or Board of Permit Appeals complained of.

21 6. Subject to further Order of this Court,
22 pending reconsideration by the Planning Commission of the
23 proposed project based on the Supplemental EIR, all permits,
24 approvals and authorizations heretofore granted by the City,
25 or any of its officers, employees, agencies or commissions,
26 to the real party in interest with respect to the proposed
27 project shall be suspended except to the extent necessary for
28 the real party in interest to complete demolition of structures

1 on the site which are partially demolished, and to secure the
2 site in the interest of public safety.

3 Let Interlocutory Judgment be entered accordingly.

4 July 27, 1982.

5

6

DANIEL H. WEINSTEIN

Judge of the Superior Court

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FILED

San Francisco County Superior Court

JUL 22 1982

CARL M. OLSEN, Clerk

By R. TAKEI

Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

SAN FRANCISCANS FOR REASONABLE
GROWTH,

Petitioner,

v.

CITY AND COUNTY OF SAN FRANCISCO;
PLANNING COMMISSION OF THE CITY
AND COUNTY OF SAN FRANCISCO;
DEPARTMENT OF CITY PLANNING OF
THE CITY AND COUNTY OF SAN
FRANCISCO; and DOES I-XX,
inclusive,

Respondents.

NORLAND PROPERTIES, and DOES
XXI-XL, inclusive,

Real Party in Interest.

NO. 794474

WRIT OF MANDAMUS

CALENDARED
BY HEINEMANN

JUL 28 1982

FOR DATE(S) _____

TO: THE CITY AND COUNTY OF SAN FRANCISCO AND

THE SAN FRANCISCO CITY PLANNING COMMISSION

We command you, immediately upon receipt of this writ, to reconsider your resolutions 9356 and 9357 certifying the 135 Main EIR and approving the 135 Main project (which

1 proceedings are hereby remanded to you), in light of the
2 matters set forth in paragraphs 3(A) and (B) of this Court's
3 Conclusions contained in its Memorandum of Interlocutory
4 Decision and Order dated July __, 1982, and to undertake such
5 further proceedings as are consistent with this Court's
6 Memorandum of Interlocutory Decision and Order or as are
7 enjoined upon you by law; but nothing in this Writ shall
8 limit or control in any way the discretion legally vested in
9 you.

10 Dated: July 27, 1982.

11 DANIEL H. WEINSTEIN

12 Judge of the Superior Court

FILED

San Francisco County Superior Court

JUL 28 1982

CARL M. OLSEN, Clerk

By Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

11 SAN FRANCISCANS FOR REASONABLE)
12 GROWTH,)
13)
14)
15)
16)
17)
18)
19)
20)
21)
22)

Petitioner,

v.

CITY AND COUNTY OF SAN FRANCISCO;
PLANNING COMMISSION OF THE CITY
AND COUNTY OF SAN FRANCISCO;
DEPARTMENT OF CITY PLANNING OF
THE CITY AND COUNTY OF SAN
FRANCISCO; and DOES I-XX,
inclusive,

Respondents.

NORLAND PROPERTIES, and DOES
XXI-XL, inclusive,

Real Party in Interest.

NO. 794474

INTERLOCUTORY
JUDGMENT

CALENDARER
BY HEINEMANN

JUL 28 1982

FOR DATE(S)

24 The Amended Petition for Writ of Mandamus came on
25 for hearing in the above-entitled Court on July 15 and
26 July 16, 1982. For purposes of hearing only, the matter was
27 consolidated with similar actions pending before this Court
28 in Civil Actions Numbers 791 326, 791 327, 792 552, and 793 064.

1 The Court has reviewed the administrative record
2 (as supplemented by petitioner during this proceeding) in its
3 entirety. The Court has also considered the extensive
4 Memoranda and arguments presented by counsel for the parties.
5 The Court having reviewed the authorities and arguments, now
6 makes this Interlocutory Judgment as follows:

7 IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

8 1. The Writ of Mandamus executed this date shall
9 issue to Respondents City and County of San Francisco and
10 Planning Commission; and

11 2. Further proceedings shall be held before this
12 Court pursuant to the Memorandum of Interlocutory Decision
13 and Order, executed this date, as well as other proceedings
14 as they appear necessary.

15 Dated: July 7[✓], 1982.

DANIEL H. WEINSTEIN

Judge of the Superior Court

APPENDIX B

TABLE B-1: MAJOR OFFICE BUILDING CONSTRUCTION IN SAN FRANCISCO THROUGH 1981 IN GROSS SQUARE FEET

Year	Total Gross Sq. Ft. Completed	5-Year Total	5-Year Annual Average	Cumulative Total of All Office Buildings	Cumulative Total of All Downtown Office Buildings
Pre-year 1960				28,145,000**	24,175,000***
1960	1,183,000				
1961	270,000				
1962	--				
1963	--				
1964	1,413,000				
		2,866,000	573,200		
1960-1964		(2,580,000)*	(516,000)*	30,725,000	26,754,000
1965	1,463,000				
1966	973,000				
1967	1,453,000				
1968	1,234,000				
1969	3,256,000				
		8,379,000	1,675,800		
1965-1969		(7,541,000)*	(1,508,000)*	38,266,000	34,295,000
1970	1,853,000				
1971	--				
1972	1,961,000				
1973	2,736,000				
1974	2,065,000				
		8,615,000	1,723,000		
1970-1974		(7,753,000)*	(1,550,000)*	46,019,000	42,048,000
1975	536,000				
1976	2,429,000				
1977	2,660,000				
1978	--				
1979	2,532,000				
		8,157,000	1,631,400		
1975-1979		(7,341,000)*	(1,468,000)*	53,360,000	49,389,000
1980	1,284,000				
1981	3,029,000				
		4,313,000+	2,156,500+		
1980-1981		(3,881,700)*	(1,940,850)*	57,241,700	53,270,700

* Net equals 90% of gross. Net new space is added at an increase factor of 90%, since it is assumed that on the average space equal to 10% of a new building is demolished to make land available for the new replacement building.

Table B-1 Continued

- ** Source: San Francisco Downtown Zoning Study, Working Paper No.1, January 1966, Appendix Table 1, Part 1. For pre-1965, data include the area bounded by Vallejo, Franklin, Central Skyway, Bryant and Embarcadero. Also includes one-third of retail-office mixed use. For post-1964, data include the entire city.
- *** Gross Floor Space for downtown offices are included for the following functional areas: Financial, Retail, Hotel, Jackson Square, Golden Gateway Civic Center, South of Market, and Outer Market Street as defined in the cited January 1966 report. For post-1964, the entire area east of Franklin Street is included.
- + Two-year total and average.

SOURCE: Department of City Planning, August 1, 1982.

TABLE B-2: PROJECTED EFFECTS OF DOWNTOWN OFFICE DEVELOPMENT ON REGIONAL HOUSING MARKETS, 1982-90

	Net Project Demand in 1985		Gross Cumulative Demand 1982 to 1990(c)		Net Housing Stock Growth 1982-1990(d)		Demand as a Percent of Growth, 1982 to 1990	
	No. Households		No. Emp. No. Households		No. Units		Project	Cumulative
	No. Households		No. Emp.	No. Households	No. Units			
San Francisco (a)	110 to 230		9,700 to 25,800	6,900 to 14,300	12,000		0.9 to 1.9	57.5 to 119.2
Peninsula (b) (San Mateo and Santa Clara Counties)	140		11,600	8,900	87,600		0.2	10.2
East Bay (b) (Alameda and Contra Costa Counties)	240		19,300	14,900	111,800		0.2	13.3
North Bay (b) (Marin and Sonoma Counties)	100		7,700	5,900	36,800		0.3	16.0
TOTAL	590 to 710		48,300 to 64,400	36,600 to 44,000	248,200		0.2 to 0.3	14.7 to 17.7

(a) The range of San Francisco employees and households is based on a report prepared by Recht Hausrath Associates, referenced as Appendix C in the 101 Montgomery Street Final EIR, EE 80.26, Certified May 7, 1981 (15-30% of all employees would reside in San Francisco and 1.4 workers would occupy each household) and "Office Housing Production Program (OHPP) Interim Guidelines," Department of City Planning, January 22, 1982 (40% of all employees would reside in San Francisco and 1.8 workers would occupy each household).

(b) The distribution of employees is based on weighted average of expected employees in Federal Reserve Bank (EE 78.207), 101 California Street (EE 78.27), Pacific Gateway, (EE 78.61), Crocker National Bank (EE 78.298), and 456 Montgomery Street (EE 78.178) (18% in the Peninsula, 30% in the East Bay, and 12% in the North Bay). The number of workers per household in these counties is assumed to be 1.3, based on 1980 Census data.

(c) Total office space considered in this analysis is about 16.1 million sq. ft. of net new office space (see Tables C-1 and C-2). The proposed Housing Element (May 1982) estimates San Francisco housing needs from 1980-85 in Table 21A. This estimate, based on the Citizen's Housing Task Force Report, July 21, 1981, shows a need for about 16,000 to 19,000 units. The "needs" estimate uses a similar office development basis, but also includes housing demand generated by other sources in addition to office development and covers the years 1980-85.

(d) Net housing stock growth is based on "Projections 79," Association of Bay Area Governments, January 1980. Projections contained in that document for 1980-1990 were prorated to reflect 1982-1990 net housing stock growth.

SOURCE: Environmental Science Associates, Inc.

TABLE B-3: HOUSING AFFORDABILITY BY HOUSEHOLD INCOME

Gross Annual Income Per Household or Per Individual	Maximum Affordable Monthly Housing Expenditure*	Housing Cost and Type of Unit			Source
		Monthly Cost**	Type of Unit	(Price)	
\$5,000	\$125				
8,300 (a)	208				
10,000	250				
10,680	267	\$267 -	Census Median Rent		(e1)
11,560	289	289 -	Studio Apartments		(f1)
15,000	375				
18,200	455	455 -	Median Rent, All Units		(f2)
20,000	500				
23,520	588	588 -	Rent, 3+ Bedroom Units		(f3)
25,000 (b)	625				
27,300 (c)	683				
30,000 (b)	750				
35,000	875				
40,000	1,000				
40,880	1,022	1,022 -	Lowest House Price (\$95,000)		(g1)
45,000	1,125	1,125 -	Census Median Value (104,600)		(e2)
50,000	1,250				
52,560 (d)	1,314				
55,000	1,375				
65,080	1,627	1,627 -	Median House Price (151,203)		(g2)
1					
101,880	2,547	2,547 -	Highest House Price (236,750)		(g3)
1					
300,000 (d)	7,500				

See following page for references.

TABLE B-3: HOUSING AFFORDABILITY BY HOUSEHOLD INCOME (continued)

- * The Office/Housing Production Program (OHPP) Interim Guidelines (January, 1982) define affordable housing as follows:
rental expenses not exceeding 30% of gross monthly income, adjusted for family size; and home ownership expenses not exceeding 38% of gross monthly income, adjusted for family size, including mortgage payments, property taxes, insurance, and/or homeownership association dues.
 For the purpose of this table, 30% of gross monthly income is used to calculate housing affordability for both renters and owners. For owners it is assumed that 8% of gross monthly income would cover property taxes, insurance, and/or homeownership association dues and other related expenses. No adjustment has been made for family size because family circumstances vary widely.
- ** Monthly housing costs refer to rents and mortgage payments for the housing prices shown in parentheses; sources of rents and house prices are as footnoted. Monthly costs of ownership housing were calculated as monthly mortgage expenses assuming 20% down payment, 30-year mortgage, and 16% interest rate, not including insurance, property taxes, and other related housing costs.
- a. U.S. Bureau of Labor Statistics, March, 1981, "Area wage survey for the San Francisco-Oakland, California Metropolitan Area." \$8,300 was the mean 1980 income of inexperienced file clerks, one of the lowest-paid office occupations listed.
 - b. The range of \$25,000 to \$30,000 is assumed to approximate the median annual income of project employees.
 - c. The \$27,300 income figure was derived by inflating the \$16,300 median income of downtown office workers from the 1974 SPUR survey through December, 1981 by 67% using U.S. Bureau of Labor Statistics national wage information for nonsupervisory finance, insurance, and real estate sector employees since 1974.
 - d. Montgomery-Washington Building FEIR, 81.104E, certified January 28, 1982. The median salary of wage earners at 601 Montgomery St. was estimated to be \$52,560 and the highest salary for corporate officers \$300,000, based on a 1981 survey.
 - e. City Planning and Information Services, "1980 Census Information," March 1982:
 1. median rent 2. median noncondominium housing value
 Rental data include residential hotels whose rent levels may be substantially lower than other types of rental dwellings and may therefore have an effect on the median rent.
 - f. Department of City Planning, "Rent Survey," 1980. Median rents are for:
 1. studio apartments 2. all units 3. 3+ bedrooms
 These data are based on a small nonrandom sample of newspaper ads and may not reflect true rental costs.
 - g. San Francisco Board of Realtors, "Multiple Sales Service," October 5, 1981.
 (Annual data on housing sales prices including all homes sold from February 11, 1981 to October 1, 1981):
 1. lowest price 2. median price 3. highest price

SOURCE: Environmental Science Associates, Inc.

APPENDIX C

 TABLE C-1: CUMULATIVE OFFICE DEVELOPMENT* IN DOWNTOWN SAN FRANCISCO AS OF
AUGUST 6, 1982

PROJECTS UNDER FORMAL REVIEW

<u>Assessor's Block</u>	<u>Case No.</u>	<u>Project Name</u>
58	82.234ED	Roundhouse
112	81.258	Ice House Conversion (C)**
136	81.245	955 Front at Green
176	81.673	Columbus/Pacific Savoy
228	81.610ED	569 Sacramento (C)
240	81.705ED	580 California/Kearny
265	81.195ED	388 Market at Pine
269	81.132ED	Russ Tower Addition
270	81.175ED	466 Bush
288	81.461ED	333 Bush (Campeau)
288	81.687ED	222 Kearny/Sutter
669	81.667ED	1361 Bush (C)
716	81.581ED	Polk/O'Farrell
3702	81.549ED	1145 Market
3703	81.494ED	1041-49 Market
3707	81.492ED	90 New Montgomery
3707	81.245C	New Montgomery Pl.
3708	81.493ED	71 Stevenson at Ecker
3733	82.29E	832 Folsom
3760	81.386	401 6th
3776	81.59	Welsh Commons
3778	81.630ED	548 5th/Brannan
3781	82.99E	Greyhound Bus Terminal
3786	82.33E	655 5th/Townsend
3789	82.31EV	615 2nd/Brannan (C)
9900	81.63	Ferry Building Rehab
9900		Pier One Development
9900		Agriculture Building

TABLE C-1: CUMULATIVE OFFICE DEVELOPMENT* IN DOWNTOWN SAN FRANCISCO AS OF AUGUST 6, 1982 (continued)

<u>APPROVED PROJECTS</u>		
<u>Assessor's Block</u>	<u>Case No.</u>	<u>Project Name</u>
106	81.415ED	1299 Sansome
161	80.191	Mirawa Center
164	81.631D	847 Sansome
164	81.573D	50 Osgood Place
166	CU81.7	222 Pacific (C)
166	80.15	750 Battery
206	81.165D	401 Washington at Battery
227	80.296	Bank of Canton
261	81.249ECQ	333 California
262	81.206D	130 Battery
267	81.241D	160 Sansome
268	81.422D	250 Montgomery at Pine
271	81.517	453 Grant
271		582 Bush
294	82.870	44 Campton Place
311	82.120D	S.F. Federal
351	DR79.24	Mardikian/1170-1172 Market
3512	82.14	Van Ness Plaza
3518	81.483V	291 10th St.
3705	80.315	Pacific III Apparel Mart
3709	81.113ED	Central Plaza
3715	82.16EC	121 Steuart
3717	80.349	Spear/Main (160 Spear)
3717	82.82D	135 Main
3722	81.417ED	144 Second at Minna
3732	81.548DE	466 Clementina (C)
3724	81.102E	Holland Ct. (C)
3729	82.860	774 Tehama
3733	81.2	868 Folsom
3735	80.106	95 Hawthorne (C)
3738	DR80.5	315 Howard
3741	82.203C	201 Spear
3749	81.18	Marathon - 2nd & Folsom
3751	77.220	National Maritime Union
3752	77.220	Office Bldg. (YBC SB-1)
3763	81.287V	490 2nd at Bryant (C)
3763	81.381	480 2nd at Stillman (C)
3775	81.147V	338-340 Brannan (C)
3776	81.693EV	539 Bryant/Zoe
3788	81.296Z	690 2nd/Townsend (C)
3787	81.306	252 Townsend at Lusk
3789	81.552EV	625 2nd/Townsend (C)
3794	81.569EV	123 Townsend
3803	81.244D	China Basin Expansion

TABLE C-1: CUMULATIVE OFFICE DEVELOPMENT* IN DOWNTOWN SAN FRANCISCO AS OF AUGUST 6, 1982 (continued)

PROJECTS UNDER CONSTRUCTION

<u>Assessor's Block</u>	<u>Case No.</u>	<u>Project Name</u>
163	81.1	901 Montgomery
164	81.251D	936 Montgomery-(disco)
167		Golden Gateway III
196		736 Montgomery
196	CU79.49	Pacific Lumber Co.
208	81.104EDC	Washington/Montgomery
237	DR80.6	353 Sacramento (Daon)
239	DR80.1	456 Montgomery
240	DR80.16	550 Kearny
263	CU79.12	101 California
287	81.550D	Sloane Building (C)
288	DR80.24	101 Montgomery
289	81.308D	One Sansome
292	DR79.13	Crocker National Bank
312	79.370	50 Grant
351	79.133	U.N. Plaza
762		Opera Plaza
3702	81.25	1155 Market/8th
3708	80.34	25 Jessie/Ecker Square
3709	80.36	Five Fremont Center
3712	79.11	Federal Reserve Bank
3715		141 Steuart
3717	79.236	101 Mission at Spear
3717		150 Spear
3718	79.12	Pacific Gateway
3724		Yerba Buena West
3735		Convention Plaza

* Includes all office projects in the greater downtown area and the South of Market area for which a Preliminary Draft EIR has been submitted to the City for review or for which plans are well defined, and all office projects in redevelopment areas that are under construction or for which Land Disposition Agreements have been approved. It does not include projects in the Rincon Point - South Beach or Yerba Buena Center Redevelopment Areas for which no Land Disposition Agreements have been approved by the San Francisco Redevelopment Agency Commission, as it is not possible to know what development will be approved in these areas. It does not include Mission Bay as no formal proposal has been submitted to the City and the project is still in early planning stages.

** The letter (C) after a project refers to a conversion (generally industrial and/or warehouse space to office space).

SOURCE: Department of City Planning.

TABLE C-2: GROSS SQUARE FEET OF CUMULATIVE OFFICE AND RETAIL DEVELOPMENT* IN DOWNTOWN SAN FRANCISCO AS OF AUGUST 6, 1982

<u>Status of Project</u>	<u>Office (Gross Sq. Ft.)</u>		<u>Retail (Gross Sq. Ft.)</u>	
	<u>Total New Constr.</u>	<u>Net New Constr.</u>	<u>Total New Constr.</u>	<u>Net New Constr.</u>
Under Formal Review	4,220,970	3,801,570	310,650	249,150
Approved	5,428,350	4,862,600	187,850	150,310
Under Construction	<u>7,753,050</u>	<u>7,427,350</u>	<u>260,250</u>	<u>136,050</u>
GRAND TOTALS	17,402,370	16,091,520	758,750	535,510

* Includes all office projects in the greater downtown area and the South of Market area for which a Preliminary Draft EIR has been submitted to the City for review or for which plans are well defined, and all office projects in redevelopment areas that are under construction or for which Land Disposition Agreements have been approved. It does not include projects in the Rincon Point - South Beach or Yerba Buena Center Redevelopment Areas for which no Land Disposition Agreements have been approved by the San Francisco Redevelopment Agency Commission, as it is not possible to know what development will be approved in these areas. It does not include Mission Bay as no formal proposal has been submitted to the City and the project is still in early planning stages.

SOURCE: Department of City Planning.

APPENDIX D: CUMULATIVE TRANSPORTATION IMPACT ANALYSIS METHODOLOGY

Travel Demand

Travel demand from the 16.1 million gross square feet of net new cumulative office development and 535,000 gross square feet of net new cumulative retail development in downtown San Francisco has been estimated using a land-use approach for trip generation. Future travel into the downtown has been assumed to be a result of construction and occupancy of downtown office and retail space. The Office of Environmental Review of the Department of City Planning (DCP) has identified office projects in the greater downtown area as being under formal review, approved or under construction. Table C-1 shows the list of projects separated by review status and includes Assessor's Block number and DCP case number for each project. Table C-2 contains the total gross square feet of office and retail space for each review status category. The information contained in these tables represents the best data available from the Department of City Planning at the time of preparation of this document.

The list of projects shown in Table C-1 and the development totals shown in Table C-2 include all office projects in the greater downtown area and the South of Market area that are under construction or have been approved, and all projects for which a Preliminary Draft EIR has been submitted to the City for review or for which plans are well defined, and all office projects in redevelopment areas that are under construction or for which Land Disposition Agreements have been approved by the San Francisco Redevelopment Agency Commission. Projects that were not definitive and/or appear to be inactive or withdrawn by the project sponsor were not included in the cumulative analyses.

Hotel projects have not been included in the cumulative analyses because hotel uses have different peaking characteristics from office buildings and generally do not significantly affect peak-hour traffic or transit. Residential projects have not been included because residential travel in the downtown is generally in the contra-commute direction during peak-hours and because the office trip generation rate and modal split distribution are

predicated on the assumption that housing would be available in the City. Thus inclusion of residential projects would be double counting of project generated travel.

Two redevelopment areas (Yerba Buena Center and Rincon Point - South Beach) and one private development (Mission Bay) are located in or near the greater downtown area. In the redevelopment areas the majority of building sites do not yet have Land Disposition Agreements (LDA) approved. Until such time as specific LDA's are approved, no estimate of travel demand can be made (thus, parcels for which no LDA exists have not been included in the cumulative analyses). Development in the Yerba Buena Center (YBC) Redevelopment Area will be in accordance with the YBC Redevelopment Plan, as amended. Possible land uses that would be in accordance with the Yerba Buena Center Redevelopment Area Plan include commercial entertainment, convention facility (in place), cultural, downtown support service, exhibit/ballroom space, hotel rooms, institutional, light industry, market-rate dwelling units, subsidized dwelling units, office, park or plaza, pedestrian concourse, parking, and retail./3/ Possible land uses in the Rincon Point - South Beach Redevelopment Area include hotel, housing, office, open space, public parking, retail, and warehouse uses./4/ Mission Bay has not been included in the cumulative analyses as no application has been submitted to the City and it is uncertain what formal proposal may be made.

Existing office and retail space that would be replaced by new buildings was subtracted from the proposed new construction to better approximate the impacts the new buildings would have on transportation facilities. As shown in Table C-2, net new office and retail space is less than total new construction as a result of subtracting out existing office and retail space on sites proposed for new buildings. ("Net new" space is used to refer to the amount of new construction in excess of existing space on each site in terms of gross square feet of floor space. It does not refer to net leasable or net rentable floor space).

Estimates of future travel have been made using trip generation rates of 17.5 person trip ends (one way trips) per 1,000 net leasable square feet of net new office space and 100 person trip ends (pte) per 1,000 gross square feet of net

XII. Appendices

new retail space./1/ Gross square feet of office space was converted to net leasable square feet by assuming an efficiency factor of 80%. The retail space has been assumed to be primarily "ground-floor retail" which would serve the office building users. Based upon survey data collected at the Embarcadero Center, approximately 45% of the travel generated by "ground-floor retail" uses has been assumed to be oriented to the office uses on-site and is already included in the office trip generation rate. Thus, 55% of the retail trip generation has been assumed to be "new" to each site./2/

P.M. peak-hour travel from the cumulative development was assigned to modes of travel based upon the regional distribution and modal split shown in Table D-1. During the p.m. peak hour about 20% of the office travel and 10% of the retail travel was assumed to occur. Of the office travel approximately 90% [during peak-hours] was assumed to be work-related and 10% was assumed to be other travel. On a daily basis, office travel was assumed to be 57% work-related and 43% other travel./5/

To calculate vehicle trip ends, average automobile occupancies were assumed for each regional area based upon available data. Currently, commute travel to the East Bay is about 1.8 persons per vehicle; the north Bay is about 1.5 persons per vehicle; and to the Peninsula is about 1.2 persons per vehicle./6/ San Francisco auto occupancy was assumed to be 1.4 persons per vehicle./7/

A basic assumption in all of the transportation analyses is that existing regional distributions and modal splits would continue into the future unchanged. Thus, the implicit assumption has been made that about 40% of the future employees would live in San Francisco. If housing is not available in the City then a greater impact than noted would result on the commute corridors into the City from the North Bay, East Bay and Peninsula. If housing is not available in the City, however, the impact on the MUNI would be less than noted because City residents are the majority of Muni users.

TABLE D-1: TRAVEL DISTRIBUTION AND MODAL SPLIT

Geographic Area	OFFICE					
	Work Travel			Other Travel		
	Geog. %*	Mode	%**	Geog. %*	Mode	%**
San Francisco Downtown/Northeast (East of Van Ness, North of Market to the Embarcadero, South of Market to 101)	7.0	Auto Muni BART Walk	9.0 61.0 1.0 29.0	33.0	Auto Muni BART Walk	2.0 20.0 0.0 78.0
Northwest (Richmond, Marina Western Addition)	15.0	Auto Muni	31.0 69.0	11.0	Auto Muni	15.0 85.0
Southwest (Sunset, Parkside, Ingleside, Excelsior, Twin Peaks, and Upper Market)	13.0	Auto Muni BART	29.0 62.0 9.0	13.0	Auto Muni BART	12.0 69.0 19.0
Southeast (Potrero Hill, Bayview, Hunters Point, East and South of 101)	5.0	Auto Muni BART	26.0 52.0 22.0	7.0	Auto Muni BART	13.0 38.0 50.0
Peninsula (San Mateo and Santa Clara Counties)	18.0	Auto Muni BART SamT SPRR	44.0 3.0 19.0 7.0 27.0	8.0	Auto Muni BART SamT SPRR	50.0 0.0 30.0 10.0 10.0
East Bay (Alameda and Contra Costa Counties)	30.0	Auto BART A-C	33.0 37.0 30.0	20.0	Auto BART A-C	13.0 79.0 8.0
North Bay*** (Marin and Sonoma Counties)	12.0	Auto GGTB GGTF	58.0 35.0 7.0	8.0	Auto GGTB GGTF	70.0 20.0 10.0

* Percent of travel with origins or destinations in each geographic area.

**Percent of travel in each geographic area using listed mode of travel.

***GGTB stands for Golden Gate Transit Bus; GGTF stands for Golden Gate Transit Ferry.

SOURCE: San Francisco Department of City Planning, TJKM, Environmental Science Associates.

The availability of short-term parking was estimated in an area within 1000 feet of the project (which was assumed to represent a 5 minute walking time). Projects proposed and under construction that would generate short-term parking demand within the 1,000 ft. radius area were identified and the short-term parking demand was summed to give a projection of short-term demand. Long-term parking demand was based upon the number of expected work-related auto trips into the downtown. Parking supply was estimated over the greater downtown and South of Market area as travel time from parking space to final destination was no longer assumed to be the primary determinant for parking selection.

Vehicle travel and parking demand have been based upon demand projections and are unconstrained by the ability of the freeway and bridge system to carry the additional demand. Freeway and bridge capacity into downtown is essentially fixed at existing levels as major construction would be required to add new capacity. Current levels of vehicle traffic on the freeway and bridge system are at or near capacity. Thus, if the projection of person trip ends in autos is assumed to be correct, the levels of vehicle occupancy would have to increase in the future as the freeway and bridge system could not handle an appreciable increase in autos at the peak hour. If vehicle occupancy were to increase, vehicle trip ends and subsequent parking demand would be less than projected. Alternately, the peak hour level of demand could spread into hours adjacent to the peak hour (as is currently happening). However, there is a finite limit as to how far the peak can spread over time and still allow business to function.

Transit demand has been projected based upon existing travel patterns and is not dependent upon the availability of transit capacity. Two levels of operations (load factor) calculations have been made. One load factor has been calculated based upon existing capacity and is intended to represent conditions that would result if no improvements are made to the transit system. The second load factor is calculated based upon forecast capacity (as defined in each agency's five-year plan) and is intended to portray conditions that would result if planned, scheduled improvements are made.

Intersection Analysis

The capacity analysis of each intersection at which a turning movement count was made utilized the "critical lane" method. This method of capacity calculation is a summation of maximum conflicting approach lane volumes that gives the capacity of an intersection in vehicles per hour per lane. (This method is explained in detail in an article entitled "Intersection Capacity Measurement Through Critical Movement Summations: A Planning Tool," by Henry B. McInerney and Stephen G. Peterson, January 1971, Traffic Engineering. This method is also explained in "Interim Materials on Highway Capacity", Transportation Research Circular No. 212, Transportation Research Board, January 1980). The maximum service volume for Level of Service E was assumed as intersection capacity. A service volume is the maximum number of vehicles that can pass an intersection during a specified time period in which operating conditions are maintained corresponding to the selected and specified Level of Service. For each intersection analyzed, the existing peak-hour volume was computed and a volume-to-capacity (v/c) ratio was calculated by dividing the existing volume by the capacity at Level of Service E. Table D-3 shows the definitions of Levels of Service related to v/c ratio.

● TABLE D-2: EXISTING AND PROJECTED MUNI LOAD FACTORS* (PM PEAK HOUR -- PEAK DIRECTION)

Line	RIDERSHIP				LOAD FACTORS			
	Existing	Future			Existing	Future		
		w/o project	project	w/project		w/o project	w/project	project
1	1453.	1963.	12.	1975.	0.93	1.26	1.27	0.01
1X	640.	874.	5.	879.	1.11	1.52	1.53	0.01
2	474.	665.	4.	669.	1.10	1.54	1.55	0.01
3	520.	702.	4.	706.	1.08	1.46	1.47	0.01
4	467.	630.	4.	634.	1.08	1.46	1.47	0.01
5	981.	1503.	8.	1511.	0.94	1.44	1.45	0.01
6	544.	834.	4.	838.	0.84	1.29	1.29	0.01
7	407.	624.	3.	627.	0.77	1.18	1.19	0.01
8	657.	1007.	5.	1012.	0.74	1.14	1.14	0.01
9	468.	717.	4.	721.	0.89	1.36	1.37	0.01
11	184.	281.	2.	283.	0.64	0.98	0.98	0.01
12	451.	691.	4.	695.	0.85	1.31	1.32	0.01
14	1038.	1590.	9.	1599.	0.92	1.41	1.42	0.01
14GL	205.	313.	2.	315.	0.71	1.09	1.09	0.01
14X	344.	486.	3.	489.	0.68	0.96	0.97	0.01
15	632.	924.	5.	929.	0.88	1.28	1.29	0.01
21	643.	986.	5.	991.	0.85	1.30	1.31	0.01
27	145.	204.	1.	205.	0.58	0.81	0.81	0.01
31	657.	941.	5.	946.	1.07	1.54	1.55	0.01
31X	413.	565.	3.	568.	0.96	1.31	1.31	0.01
32	476.	619.	4.	623.	0.79	1.03	1.04	0.01
38	1963.	2748.	16.	2764.	1.01	1.41	1.42	0.01
38AX	453.	619.	4.	623.	1.26	1.72	1.73	0.02
38BX	272.	372.	2.	374.	0.96	1.32	1.33	0.01
41TC	119.	167.	1.	168.	0.41	0.58	0.58	0.01
41MC	184.	258.	2.	260.	0.43	0.60	0.60	0.01
42	393.	596.	3.	599.	0.99	1.50	1.51	0.01
45	561.	757.	5.	762.	0.90	1.21	1.22	0.01
71	447.	685.	4.	689.	1.10	1.68	1.69	0.01
80X	416.	588.	3.	591.	0.83	1.17	1.17	0.01
J	909.	1393.	7.	1400.	0.84	1.28	1.29	0.01
KLMN	5725.	8773.	47.	8820.	0.96	1.47	1.47	0.01

*The load factor is the ratio of ridership to existing capacity, where capacity is calculated from the recommended maximum loading of the transit vehicles which is 150% of seated capacity. As estimates of load factors, these should be regarded as approximate. Muni cordon points, where the ridership and capacity counts were made, do not necessarily correspond precisely to the point of maximum loading on each line. The future load factors have been calculated using existing capacity and do not include any proposed capacity increases. Ridership is the average of three most recent schedule checks for each route for the months of August 1981 to August 1982, as compiled by the Department of City Planning.

TABLE D-3: VEHICULAR LEVELS OF SERVICE

Level of Service	Description	Volume/Capacity* v/c Ratio
A	Level of Service A describes a condition where the approach to an intersection appears quite open and turning movements are made easily. Little or no delay is experienced. No vehicles wait longer than one red traffic signal indication. The traffic operation can generally be described as excellent.	0.60
B	Level of Service B describes a condition where the approach to an intersection is occasionally fully utilized and some delays may be encountered. Many drivers begin to feel somewhat restricted within groups of vehicles. The traffic operation can be generally described as very good.	0.61- 0.70
C	Level of Service C describes a condition where the approach to an intersection is often fully utilized and back-ups may occur behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so. The driver occasionally may have to wait more than one red traffic signal indication. The traffic operation can generally be described as good.	0.71- 0.80
D	Level of Service D describes a condition of increasing restriction causing substantial delays and queues of vehicles on approaches to the intersection during short times within the peak period. However, there are enough signal cycles with lower demand such that queues are periodically cleared, thus preventing excessive back-ups. The traffic operation can generally be described as fair.	0.81- 0.90
E	Capacity occurs at level of service E. It represents the most vehicles that any particular intersection can accommodate. At capacity there may be long queues of vehicles waiting up-stream of the intersection and vehicles may be delayed up to several signal cycles. The traffic operation can generally be described as poor.	0.91- 1.00
F	Level of Service F represents a jammed condition. Back-ups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration. Hence, volumes of vehicles passing through the intersection vary from signal cycle to signal cycle. Because of the jammed condition, this volume would be less than capacity.	1.00

* Capacity is defined as Level of Service E.

SOURCE: San Francisco Department of Public Works, Traffic Division, Bureau of Engineering, 1965.

Employment Trend Approach to Cumulative Analysis

In this and other San Francisco EIRs, a land-use type of approach has been used to estimate the transportation impacts of both the proposed project and cumulative development. An alternate type of approach is to forecast travel demand based upon regional projections of employment share (employment trend approach)./8/ Briefly, the fundamental differences between (and limitations of) the two approaches are:/9/

The land-use approach (as it has been applied in this EIR) has used net new office space actually proposed or under construction (less space in buildings demolished to make way for new buildings) as the basis for travel generation. The land-use approach assumes that literally all of the currently proposed development in the downtown area will be constructed and fully occupied within the time frame of the 135 Main Street project development and occupancy. No allowance has been made for less than 100 percent occupancy, for proposed developments that are never constructed, or for those which would not be occupied within the time frame of the 135 Main Street project.

The employment trend approach generates a total increase in employment in downtown that has taken account of loss of employment as industries and offices move out of the City, replacement of one type of industry with another (industry shifts), as well as, replacement of existing office space with new office space. The employment trend approach makes no implicit assumptions concerning occupancy rates or actual square footage of development constructed; rather, it generates total employment increases from a standpoint which assigns jobs by metropolitan sector (area) based upon extrapolation of past trends and which considers long-term industry shifts to, within, and away from each area.

Note that neither of the two approaches has attempted to project future changes in modal split.

To illustrate the differences in projections resulting from the two approaches, Table D-4, following, shows the total employment projections by the two methods (and the project's share thereof), the regional distribution of trips, and Muni's share of the new transit travel (and the project's share thereof).

As shown in the table, the employment trend approach predicts about 15 percent fewer employees in the downtown and about eight percent more riders on the Muni than does the land-use approach. The employment trend approach would thus approximate the transit demand impacts discussed on pp. 14-15 of the EIR.

TABLE D-4: COMPARISONS OF LAND-USE AND EMPLOYMENT TREND APPROACHES

Approach	Downtown Employment Increase	Project Share*	Regional Trip Share				Muni Peak-hour Increase**	Project Share***
			S.F.	Pen.	E.B.	N.B.		
Land Use	64,400	1.6%	49%	16%	24%	11%	12,000	1.6%
Empl. Trend+ (maximum)	56,100	1.9%	50- 54%	19%	17- 21%	10%	12,900++	1.5%

NOTE: As explained in the text, comparisons between the entries for the two approaches must be made with the understanding that the land-use approach reflects increases in employment and transit demand based solely upon increases in downtown office space, while the employment trend approach reflects total increases therein based upon historical trends. The differences among the regional trip share figures reflect these and the other differences between the two approaches.

*Employment generated by the proposed 135 Main Street project, as a percent of the cumulative downtown employment increase.

**The Muni peak-hour increase is a demand projection (based upon existing and long-term employment trends) that is not dependent upon available or expected transit capacity.

***Muni peak-hour trips generated by the proposed 135 Main Street project, as a percent of the cumulative downtown Muni peak-hour increase.

+These figures, represent the worst-case analysis under the employment trend approach reviewed and accepted by MTC, ABAG and Muni. Note that the land-use approach entries assume that an additional net new 16.1 million gross square feet of office space and 0.5 million gross square feet of net new retail space will come on line by late 1990.

++Based on 54 percent regional trip split to San Francisco (worst-case).

Several considerations concerning both of the methods need to be noted. The land-use approach, as it has been applied in San Francisco EIR's, analyzes impacts for the p.m. peak hour, whereas the employment trend approach analyzes the a.m. peak. Several reasons exist as to why one peak (or the other) may be the better one to analyze.

First, the p.m. peak may be more useful to analyze, in that actual observation shows that the p.m. peak has a greater overall effect on the local street network and transit system in the downtown area than does the a.m. peak, as more travel takes place during the p.m. peak. Also, transit service is more inclined to differ from scheduled times during the p.m. peak than during the a.m. peak, as operational delays have had an 8- to 10-hour period over which to accumulate. Finally, the on-ramps to the freeway/bridge system are greater bottlenecks (in the p.m. peak) than are the off-ramps (in the a.m. peak).

Conversely, the peaking characteristics of the a.m. peak may be more useful in that they are much sharper than those of the p.m. peak (i.e., a greater percentage of the peak-period travel occurs during a single hour). Also, as a result of the bridge system into San Francisco, travel inbound into the City is much easier to document, as tolls are collected on the inbound direction on the Golden Gate and Bay Bridges. Finally, a greater proportion of the travel occurring during the a.m. peak is employment-related; the p.m. peak includes shopping and pleasure trips which are not directly affected by increased office space.

The land-use approach, as it has been used in this Supplemental EIR, examines the p.m. peak because it has been observed to be the worst case for congestion on the City transportation system. This analysis does not reflect the spreading of the p.m. peak that is currently occurring, as all of the new trips have been assumed to take place in a single hour.

While the land-use approach assumes all new office space is fully occupied, the assumption of a functional vacancy rate of 5 percent is not uncommon.^{8/} With 16.1 million square feet of new office space assumed in the land-use approach to be occupied by 1990, a 5 percent vacancy would amount to approximately 805,000 square feet, representing 7,200 employees (at 250 square

feet per employee), 600 of which would ride Muni in the p.m. peak hour. This adjustment for vacancy would thus reduce Muni peak-hour impacts in the cumulative analysis stated above by these 600 riders.

The land-use approach calculations have assumed transit capacity to be fixed at existing levels. The OER memorandum/8/ points out, "It should be recognized that transportation is a more 'elastic' resource with many options for expansion including increasing existing capacity by using articulated vehicles, expanded car pool and van pool programs and increasing the peak commuter period through flex-time programs, among others."

If future office development does not occur along the lines of the past long-term trends as assumed in the employment trend approach, then the projections made in Working Paper I would be revised. The average annual growth during the period 1965-1980 was less than the growth per year proposed, approved, or under construction for the period 1980-1984. The employment trend approach assumes average growth through 1990 would be at the lower historic rate, reflecting activity fluctuations from the current rate including slowdowns due to changing business conditions.

Until a forecast exists to determine how the current decade's cycle of development may differ from the past, a judgment of the applicability of results from Working Paper I may not be made. Consequently, this EIR has retained the land-use approach and presented this comparison of the employment trend approach. Both methods should be looked upon as describing potential scenarios of future conditions.

NOTES - Appendix D

/1/ Land uses from Draft Second Supplement Yerba Buena Center Final Environmental Impact Report, San Francisco Department of City Planning May 28 1982.

/2/ Land uses from Rincon Point - South Beach Redevelopment Area, San Francisco, California, Final Environmental Impact Report/Environmental Impact Statement, San Francisco Department of City Planning certified November 5, 1980.

/3/ The regional distribution, office trip generation, trip purpose and peak hour percentage are from Attachment 1 of the Guidelines for Environmental Impact Review, Transportation Impacts Department of City Planning, October 1980 and the modal split assignment is from Attachment 2 supplemented by survey data collected by Environmental Science Associates, Inc.

/4/ Retail trip generation is from Trip Generation, Institute of Transportation Engineers (ITE), 1979. Rates have been adjusted from vehicle trip ends to person trip ends based upon an assumed vehicle occupancy of 1.4 persons per vehicle. The survey of retail travel was conducted by Environmental Science Associates at Embarcadero Center on Thursday, June 17, 1982 between 10:00 a.m. and 4:00 p.m.

/5/ The percentage of work and non-work trips is from the Guidelines (see note 1) and from Urban Travel Patterns for Hospitals, Universities, Office Buildings, and Capitols, Report No. 62, National Cooperative Highway Research Program.

/6/ East Bay auto occupancy is from data collected at the Bay Bridge toll plaza by the Metropolitan Transportation Commission; North Bay auto occupancy is from data collected at the Golden Gate Bridge toll plaza by the Golden Gate Bridge, Highway and Transportation District; Southern Peninsula auto occupancy is an estimate from CalTrans.

/7/ The occupancy rate is from The Downtown Traffic and Parking Study, San Francisco Department of Public Works, 1970.

/8/ Department of City Planning, Working Paper I, Projection of Long-range Transportation Demand, May, 1982, prepared in cooperation with the Metropolitan Transportation Commission (MTC), the Association of Bay Area Governments (ABAG), and the Municipal Railway (Muni). Employment trend data was compiled by ABAG from trends in County Business Pattern (U.S. Department of Commerce, Bureau of the Census, March 12, 1979), with 1979 as the base year for future projections and regional distributions. Modal split data are from the 1975 Travel Survey prepared by MTC.

/9/ The Department of City Planning, Office of Environmental Review (OER), has issued a memorandum, dated July 2, 1982, dealing with the subject of the differences in the land-use and employment trend approaches, and recommending that both approaches be used in future EIRs to give a more balanced assessment of future peak transportation demand. This memorandum is on file with and available from the Office of Environmental Review, 450 McAllister St., 5th Floor. The memorandum calls out some of the fundamental differences between the two approaches and also details the limitations of each approach.

APPENDIX E

TABLE E-1 : SAN FRANCISCO AIR POLLUTANT SUMMARY 1979-1981

STATION: 939 Ellis Street (1979) and 900 23rd Street (1980-81), San Francisco					
POLLUTANT:	STANDARD	1979	1980	1981	
OZONE (O ₃) (Oxidant)					
1-hour concentration (ppm /a/)					
Highest hourly average	0.10/b/ 0.12/c,d/	0.08	0.09	0.07	
Number of standard excesses (state)		0	0	0	
Expected Annual Excess (national)/d/		0.0	0.0	0.0	
CARBON MONOXIDE (CO)					
1-hour concentration (ppm)					
Highest hourly average	35/c/	20	10	8	
Number of standard excesses		0	0	0	
8-hour concentration (ppm)					
Highest 8-hour average	9/c/	13.8	7.5	5.3	
Number of standard excesses		1	0	0	
NITROGEN DIOXIDE (NO ₂)					
1-hour concentration (ppm)					
Highest hourly average	0.25/b/	0.16	0.17	0.11	
Number of standard excesses		0	0	0	
SULFUR DIOXIDE (SO ₂)					
24-hour concentration (ppm)					
Highest 24-hour average	0.05/b/	0.034	0.018	0.016	
Number of standard excesses/e,f/		0	0	0	
TOTAL SUSPENDED PARTICULATE (TSP)					
24-hour concentration (ug/m ³ /g/)					
Highest 24-hour average	100/b/	117	173	103	
Number of standard excesses/f/		1	6	1	
Annual concentration (ug/m ³)					
Annual Geometric Mean	60/b/	42.0	52.1	56.0	
Annual standard excess		No	No	No	

/a/ ppm: parts per million.

/b/ California standard, not to be equaled or exceeded.

/c/ National standard, not to be exceeded more than once per year (except for annual standards which are not to be exceeded).

/d/ The national ozone standard was revised from 0.08 ppm to 0.12 ppm in January 1979 and is now expressed in terms of the Expected Annual Excess, which is a three-year average of annual excesses of the 0.12 ppm value.

/e/ The sulfur dioxide standard is considered to be exceeded only if there is a concurrent excess of the state ozone or suspended particulate standards at the same station. Otherwise, the national standard of 0.14 ppm applies.

/f/ Number of observed excess days (measurements taken once every six days).

/g/ ug/m³: micrograms per cubic meter.

SOURCE: BAAQMD, Air Pollution in the Bay Area by Station and Contaminant; and CARB, California Air Quality Data.

APPENDIX F

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RECEIVED

OCT 12 1982

ENVIRONMENTAL SCIENCE ASSOCIATES
SAN FRANCISCO, CA 94102

October 8, 1982

Nancy Cunningham-Clark
ESA
1490 Market Street, Suite 215
San Francisco CA 94102

IN RE: EE81.61

Dear Ms. Cunningham-Clark:

At various points in my testimony on the Supplemental EIR on 135 Main I referenced documents and detailed points which I stated I would provide in detail to you and the Office of Environmental Review. This is to provide that information.

The specific articles I referenced are as follows:

Newsweek, October 11, 1982 - page 96 - Office Space Goes Begging. Cites office over-building and vacancy problems, specifically in San Francisco. Mentions problems with 353 Sacramento Street. Question raised - is San Francisco on the verge of an office space glut because of overproduction and extremely high rent? What would be the consequences to the City if such were the case.

San Francisco Examiner, October 7, 1982 - page B1 - Demolition permit ignites ruckus. Cites demolition permit for warehouse on Mission at Main. DPW cites as reason for emergency demolition permit, evading the CEQA process, the danger of the building falling down due to construction on adjacent lots. Why is that hazard omitted from the EIRs for 135 Main, 101 Mission, Spear/Main? How could the problem be so severe and not be caught already? Or is it not a hazard and just an excuse to tear down the building?

San Francisco Chronicle, October 7, 1982 - pages 7 and 8 - The Projects Taking Shape Along the Bay. Cites incredible traffic congestion, capacity and air quality problems resulting from development along Highway 101 in San Francisco, San Mateo and Santa Clara counties. 20 million square feet of commercial space. Implications include possibly filling the bay or widening 101. This needs to be included in the analysis of cumulative impacts of San Francisco development because of the role of that corridor in moving people into downtown San Francisco and of the limiting of capacity that might be occurring.

October 8, 1982 - Nancy Cunningham-Clark - page 2

San Francisco Examiner - September 15, 1982 - page B14.
Consultant to assess impact on downtown. Oakland has allocated \$500,000 to evaluate the impact of new downtown construction. Cites 18 million square feet proposed within past year in downtown Oakland redevelopment area. Bottom line from Oakland planning director - "At what point can the downtown no longer take any more developments?" An important question. Would that San Francisco would not be so faint-hearted that its "leaders" could not utter those words. Factor in the development planned in Oakland, since that development will clearly impact the ability of San Francisco to latch on to freeway, bridge, transit and regional housing capacity (not to mention air quality standards) to accomodate its development schemes.

East Bay Express - August 20, 1982 - pages 1 and 11. Cites difference in rental costs between San Francisco and east bay as fueling the fires of development in Oakland. Lists buildings that will house 60,000 new workers. Oakland story above relates only to redevelopment area. This includes entire city. Relation to San Francisco - as above in Examiner story, but implications greatly multiplied.

Kaiser Center EIR - EE 81.71 - City of Oakland. This project alone would include 4.42 million square feet of commercial space. Please read and incorporate relevant material from traffic and transportation section, much of which deals with demands on regional freeway system (which runs through Oakland and other east bay cities to get to Bay Bridge so people can get into San Francisco) and on BART and AC Transit. Cumulative impact analysis includes approved and proposed projects. Approved projects table, p. 68, includes 1,368,200 office and retail and 970 hotel rooms. Note the inclusion of retail and hotel space factored into traffic analysis. Proposed project list, p. 69, includes projects at various level of development of proposal and notes same. Total square feet - 14,705,000 in central business district. NOTE ALL ANALYSIS IN THIS EIR INCLUDES CUMULATIVE DEVELOPMENT LEVELS IF ALL PROPOSED PROJECTS WERE BUILT. Page 79 et seq. details problems with AC capacity and expansion. This information needs to be incorporated into SF EIRs along with information on demands that may be placed by East Bay development which may adversely impact ability of AC to move people into San Francisco. Page 82 et seq. - BART problems which will arise if cumulative development levels occur in East Bay. BART will be over capacity virtually throughout entire system. How would the juggling needed to accommodate East Bay affect the ability to juggle that same capacity to meet demands being placed by San Francisco? Air quality analysis - note use of vehicle miles traveled analysis to show impacts on air quality - something that should be in this EIR. Page 105 - increase in VMT would delay attainment of air quality goals. Since commute distances into San Francisco are presumably greater than commute distances into Oakland. would not the VMT analysis make even greater for SF the delay in attainment.

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TransPacific Centre EIR - EE81.78 - City of Oakland. Similar to Kaiser Center EIR in terms of issues and information.

Reference to Carl Imparato comments on previous EIRs on MUNI cost analysis. I am attaching an analysis of the inconsistent figures used in San Francisco EIRs to estimate costs of MUNI service. To show how ludicrous the calculations used by Bernhard are:

Table 2, page 19 shows that cumulative development will add 12,000 new pm peak MUNI riders

Page 20 notes that with cumulative development the peak pm riders will total 34,300

12,000 divided by 22,300 (34,300 minus 12,000) shows that peak pm MUNI ridership will increase 54%

Berhard says that such service is provided at a cost per ride of 71¢, with average ride revenue of 32¢, leaving a deficit per rider of 39¢

Therefore the daily cost to provide pm service is
 $71¢ \times 12,000 = \$8,520$

and the daily deficit for that service is
 $39¢ \times 12,000 = \$4,680$

Multiplying that times 260 work-days and doubling it to add people getting to work in the morning

$\$8,520 \times 260 \times 2 = \$4,430,400$ annual cost to provide MUNI service to 12,000 new riders

$\$4,680 \times 260 \times 2 = \$2,433,600$ annual deficit to City in providing MUNI service to 12,000 new riders

THIS IS MARVELOUS. A 54% INCREASE IN RIDERSHIP AT A COST OF MERELY \$4.4 million per year.

Please provide the above calculations to not only Bernhard, but also to Sklar and the members of the Public Utilities Commission and ask if they are willing to stick by the phone call between ESA and Bernhard as the definitive statement on the costs to MUNI of providing greatly increased service. Do you, ESA, and you, OER, believe those figures are real? Please remember that the law requires you to certify that the information is accurate and objective.

PROJECTS OMITTED FROM YOUR LISTS

Page 64 - Projects Under Formal Review

Please provide square feet of each project.

Block 228 - 569 Sacramento is approved

Block 3776 - Welsh Commons - approved

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Add the following projects:

141	81.151	100 Broadway	13,800	
177		1066 Grant	6,200	
258	82.421	Pine & Kearny Off. Bldg	400,000	
297	81.400	Olympic Club Hotel	293,500	
331	81.448	Union Square West	124,310	+ 507 hotel rms
342	81.17	Warfield Hotel	410,000	
647	81.417	1670 Pine	?	
690	RDA	Grosvenor (Post/Van Ness)	88,000	
768	81.22	Franklin & McAllister	53,600	
813	79.449	Fox Plaza Addition	142,000	
814	81.540	101 Hayes	131,900	
836	80.181	99 Oak	125,992	
3518	81.483	291 10th Street	?	
3702		Trinity Plaza	2,000,000	
3704/05	81.559	Lurie (5th & Market)	1,978,150	
3707	80.343	YBC/GSA	1,000,000	
3708	81.297	562 Mission	557,000	
3717	81.183	Mission/Main	352,000	
3719	81.138	301 Mission	261,500	
3722	81.280	199 New Montgomery	133,000	
3742	80.109	275 Steuart	207,000	
3750	82.241	2nd & Harrison	238,000	
3783	81.372	650 7th Street	134,000	
3788	81.352	640 2nd Street	39,079	
3803		195 Berry	113,000	
4491	82.197	SF Executive Park	1,330,000	
6272	81.470	Mission and Russia	59,300	
	RDA	Vanguard Van Ness/Turk	150,000	leasable
		Hills Brothers	700,000	leasable
		Mission Bay - per Residence		
		Element EIR, p. 36, 40,000		
		day-time workers	10,000,000	
		Rincon Point - per Residence		
		Element EIR, p. 37, 7,000		
		day-time workers	1,750,000	
13	82.419	350 Beach	?	
65	82.168	990 Columbus	10,750	
113	82.418	1171 Sansome	30,000	
146	82.401	644 Broadway	?	
176	82.368	900 Kearny	?	
180	82.183	963 Pacific	?	
227	82.463	505 Montgomery	?	
317	82.144	Grosvenor Townhouse	153,270	
327	82.445	Zaber-Stockton/O'Farrell	?	
529	82.424	1734 Union	?	
542	82.147	1969 Union	10,575	
612	82.446	2318 Fillmore	?	
641	82.200	1735 Franklin (conv)	?	
642	82.224	1601 Van Ness (conv)	70,958	
671	82.24	1581 Bush (conv)	16,000	
816	82.212	395 Hayes (conv)	?	
3504	82.137	44 Gough (conv)	?	

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3534	82.139	1975 Market (conv)	?
3706/3723/3734			
	82.35	Olympia & York/YBC	5,095,000
3744-3749			
64/69	82.39	Rincon Hill Special Use D.	?
3750	82.77	642 Harrison (conv)	?
3763	82.384	400 2nd Street (conv)	81,384
3780	82.19	870 Brannan (conv)	230,000
3794	82.416	155 Townsend	170,000
3916	82.406	15th & Vermont Whl Shrm	?
3918	82.232	Wholesale Mart Addtn	62,353

PLUS, in this list at the very least, or in approved projects, please add in all projects/ uses approved in redevelopment plans for Western Addition I & II, Yerba Buena outside central blocks, Rincon Point/South Beach, because Planning has already signed off on them and will have no control regarding approval. They must be considered in the pipeline since they have already been approved as part of city policy by Supes, DCP/CPC and Redevelopment. Also any further possibilities in Golden Gateway and other redevelopment areas.

Page 65 - Approved Projects

Correction - block 3722 is 3732
Please provide square feet for each project.
Add the following projects -

52	80.248	Francisco Place	50,000
143	81.353	1000 Montgomery (conv)	39,000
325	79.257	Hilton Tower #2	317,000
326	79.283	Holiday Inn	422,300
742	81.12	790 Van Ness	77,000
767	78.377	State Office Building	266,900
3701	79.314	Holiday Inn-Civic Center	124,900
3735	RDA	Gift Mart	340,000
3776	81.59	Welsh Commons	56,000
3788	81.15	690 2nd Street	16,600
4991	75.198	SF Executive Park III	345,000

Page 66 - Projects Under Construction

313	77.257	Neiman-Marcus	175,000
22	79.263	Holiday Inn- F Wf	141,800
330	80.171	Hotel Ramada	683,000
642		1625 Van Ness	95,000
671	RDA	Wealth Investments	118,500
738	RDA	One Flynn Center	?
3706	RDA	Meridien Hotel	?
3735	RDA	Planters Hotel conv	?
3763	80.161	485-95 3rd St	10,300
3951	81.446	1099 16th St	15,000
4991	75.198	SF Executive Park II	105,000

QUESTION - Are there other approved/under construction Redevelopment projects (specific projects, as apposed to Redevelopment plan)?

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To reiterate my verbal testimony:

It is not okay to drop retail space, since by terms of your own traffic analysis retail space generates more trip ends than office space, and there are consistent findings on pedestrian and vehicular traffic, transit and formerly air quality, which are all related to the amount of persons travelling to the site

It is not okay to drop hotel space - change the factors if you think it necessary, but they do not have a zero impact on pedestrian and vehicular traffic, etc. - and since they all generate employment, on housing demand. (Housing is also a factor in retail employment) Do the relevant calculations, but don't eliminate the projects totally from lists of cumulative development.

It is also not okay to drop projects like Executive Park from the analysis. If the employment patterns follow San Francisco/commuter mix, there will clearly be all of the traffic/transit related impacts although the location may be modified. Unless you have specific information for a project outside the CBD to show that it has NO impacts on traffic, transit, etc. you cannot zero it out when all of the EIR resolutions are making findings of cumulative impact.

Two letters from regional agencies were referenced in my testimony. Both came in on the Citicorp EIR. The first is from Bay Area Air Quality Management District, dated May 29, 1982. It is contained in the Final Citicorp EIR and raises questions that are still relevant about various alternatives, including locations closer to where people work, to reduce air pollution. In light of plans in San Mateo, Oakland, other east and north bay locations, perhaps San Francisco needs to confront the issue of where development should occur in the region to minimize air quality, traffic and transit impacts. Isn't that what the EIR process is supposed to be about anyway. The questions raised in that letter should be addressed.

The second letter is from Caltrans, dated May 22, 1981 and is also contained in the Final Citicorp EIR. The specific point that I would also like to stress is:

"The listed mitigation measures have not clearly been evaluated for their own environmental effects and there is no evaluation of the effectiveness of the measures to assure a reasonable service level or even to maintain the levels that now exist."

The other general comments also deserve response.

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Finally, I also incorporated by reference the resolution approving the 135 Main project - Res. 9357. As we are all well aware the Department has developed boiler plate language on mitigations and various findings. I hereby ask specifically that the Commission's findings on page 2 that specific mitigation measures will mitigate significant effects on traffic and pedestrian use of adjoining streets, on transit use and transit and parking demand in the downtown area, and on housing demand. Please specify item by item what effects are being mitigated by each item, quantify the amount of mitigation and analyze the impacts of the mitigation measure on the environment (see Caltrans letter above).

For example, what does it mean, "project sponsor will cooperate in mitigating cumulative impacts on pedestrian traffic flow?"

SFRG and the MUNI asked that a requirement for funding for MUNI that is not conditioned on legislation or successful litigation be imposed. This has not been required. Is this within the jurisdiction of another City agency? Is it infeasible - where is the information?


Please document the need for further strengthening of the C-3-0 district as a compact center for financial, technical, professional and administrative services. Is it currently weak in that area? Will the area continue to be "strengthened" even if it collapses under its own weight in the areas of traffic, transit, pedestrians, bridge capacity - which findings are made elsewhere in the resolution, and certainly in the information available in the EIR which talks about extended rush hours, cars unable to come into the city because capacity reached, MUNI way over capacity. IS THIS STRENGTHENING DOWNTOWN BY BRINGING THE SYSTEMS TO A NEAR COLLAPSE?

Please tell me what is the urban garden.

Is the effect of the transit broker - presuming it is successful in taking people out of their cars and onto transit or pools - factored already into the transportation analysis, or will the impacts be increased if this and every other transportation broker is successful?

Please consider these comments to apply also to the 333 Bush Street EIR, and all future downtown office EIRs.

Sincerely,


Sue C. Hestor

Attorney, San Franciscans for Reasonable Growth

cc: Paul Rosetter

August 5, 1982



MEMORANDUM

To: City Planning Commission

From: Dean L. Macris, Director

Subject: Muni's Plans to Accommodate Downtown Growth

The purpose of this memorandum is to put into perspective current discussions regarding the need for additional Muni service created by downtown growth. The memorandum has been prepared with the assistance of Public Utilities Commission staff.

The Downtown Transportation Improvement Program Working Paper I, presented by Department of City Planning staff to the Commission in May, documented projections of additional downtown employment for the next 10-year and 20-year periods, and the residential distribution of these employees within the region. Working Paper I is based on assumptions endorsed by this Department, Muni, the Metropolitan Transportation Commission and the Association of Bay Area Governments (ABAG) and uses employment trends based on Standard Industrial Classification job category data as documented by ABAG. In addition, Working Paper I projects additional demand on all transportation corridors and operators, including Muni, as a result of downtown employment growth, if current modal split patterns continue.

Muni involvement in long-range employment and residence projections is critical because Muni staff is in the process of producing two plans for the system's continued development: a Fleet Rehabilitation and Replacement Plan (a part of the Muni Five-Year Plan 1982-1987) and a Facilities Master Plan. The Public Utilities Commission adopted the Rehabilitation and Replacement Plan in May. The Transportation Policy Group also endorsed the Rehabilitation and Replacement Plan at its June meeting. The plan is designed to accommodate the downtown demand forecast outlined in Working Paper I, as well as additional system demands. It will be revised annually to reflect any new information that may become available and to maintain foresight in planning.

The following material summarizes 1) the pertinent findings of Working Paper I, 2) Muni's plans to accommodate growth, 3) additional improvements planned by Muni, 4) how the Muni plans are expected to be funded, 5) other measures being taken to improve service and meet increased demand, and 6) the situation for the other regional transit operators serving downtown San Francisco.

Summary of Downtown Muni Demand Projections

Working Paper I shows a range of from about 50,000 to 56,000 additional employees working in the greater downtown area by the beginning of the 1990's. The lower, or "expected", number is based on consideration of San Francisco's share of growth in relationship to regional growth trends; the higher, or "maximum", number is based on the historic growth trends in San Francisco taken by itself. Working Paper I notes that it will be appropriate to reconsider these projections when information from the 1980 Census, Downtown EIR or other data sources are available; the Downtown EIR is expected

to provide information which would allow a comparison of land use development trend data with these employment trends.

Working Paper I projects that somewhere between 11,000 to 30,000 of these additional downtown workers would live in San Francisco. There is a wide range here because it is unclear to this point how much housing will be constructed in the City or elsewhere in the region.

Not all of these additional downtown workers are expected go to work during the peak period on an average day. Consequently, Working Paper I reduces employment projections by 16% to reflect varying work hour shifts and absenteeism. This adjustment will more accurately reflect the peak period work trip demand on the transportation system.

Using current modal split patterns, Working Paper I shows that somewhere between 4,500 to slightly more than 12,000 additional San Franciscans would need to be carried on Muni at peak periods daily as a result of downtown growth over the next 10 years. (These figures are modified to include an additional number of new downtown employees who would live on the Peninsula, commute by Southern Pacific/Caltrans commuter rail service and transfer to Muni for the final leg of the trip downtown).

Muni's Plans for Accommodating Growth

Muni has calculated its 10-year vehicle requirements based on the assumption that downtown would add the "maximum" number of new employees (56,000) and that the maximum number of those new employees (30,000) would live in San Francisco. Muni believes it is prudent to plan for the higher end of the range for two reasons. First, based on an analysis of current downtown development trends, Muni believes that employment growth would be higher in the short-run (i.e., up to five years) than that extrapolated from the 10-year ABAG employment projections; as a result, Muni demand projections over a 10-year period likely would have been understated. Second, it is better to err slightly on the side of adequate capacity rather than perpetuate underserved conditions (this is particularly important in the longer-range facilities master planning). Because the plan will be revised regularly, the annual small fleet additions recommended in the Rehabilitation and Replacement Plan may be increased or decreased based on the most current demand projections.

The vehicle Rehabilitation and Replacement Plan is an ambitious one based not only on accommodating this projected downtown growth but also based on assumptions regarding other factors that may effect growth in transit demand:

- 1) Additional demand was assumed to come from the maximum number of new employees projected for the rest of San Francisco (outside downtown), shown in Working Paper I to be an additional 6,000 workers by 1990.
- 2) Since some peak period trips are known to be non-work trips, rather than deduct the 16% of workers who would not be seeking peak period service, Muni used a working assumption that an equal 16% percent of its patronage consisted of non-work trips, and that the demand for these non-work trips at peak periods would continue to grow at the same rate as work trips.

- 3) Muni assumed that there would be a modal shift over the next ten years of 3%; that is, that a greater percentage of San Franciscans' peak period trips would be made by transit rather than automobile.

Finally, all of these increases in patronage demand were added to the increase in vehicles required for service improvements described in Muni's Service Design Plan (also part of the Muni Five-Year Plan). The Service Design Plan calls for a redeployment and slight increase in Muni's fleet in order to provide better service -- not to provide for growth in patronage. Some of the Service Design Plan vehicle increases are funded/purchased already and will be in operation in the near future, such as the additional 22 LRVs expected to be in service by mid-1983.

The additional service needed was projected over several different "scenarios", or vehicle mixes (different combinations of electric, non-electric, standard-size, articulated vehicles, etc., each with different standard service lives, requiring different rehabilitation schedules for current vehicles). The option selected was a fleet design Muni planners assumed to be the most probable.

Additional Muni Service Improvements

Muni is involved in several efforts aimed at improving service quality, in addition to providing a larger fleet to accomodate growth in demand.

One of the most common ways for understanding and measuring service quality is in terms of passenger comfort and overcrowding. For many years Muni has defined its capacity and maximum acceptable service standard to be a load factor of 1.5 times the number of seats, that is, allowing $33\frac{1}{3}\%$ standees (this varies according to vehicle type; a load factor of 2.0 on LRVs is considered acceptable). Muni's Service Design Plan is not intended to reduce this overall system standard. As indicated in Working Paper I, a 1.5 maximum load factor standard is higher than other Bay Area transit systems. Muni's higher load factors are not a matter of choice; rather, they are necessitated by its inadequate fleet size and constrained operating funds. Golden Gate transit, for example, currently is able to schedule peak service at a 0.9 load factor, due to its adequate fleet size. While other Bay Area transit operators also exceed their peak load factors, overcrowding clearly is a relative problem; exceeding a 1.3 load factor on BART may not appear significant when Muni Metro load factors exceed 2.0.

Not only must Muni schedule at relatively high load factors, but actual peak loads sometimes exceed this standard. Using ride check data from Muni's Schedules and Traffic department, it is calculated that 16% of Muni's peak trips are at load factors of 1.5 or above. Muni currently is conducting a study to more accurately assess the extent of overcrowding.

Muni overcrowding also is accentuated when it experiences maintenance difficulties. Although service reliability and availability in the last three years have been the highest in any of the last ten years, Muni's diesel fleet problems last fall caused load factors to rise substantially when full scheduled service could not be provided due to maintenance problems. Muni realizes that equally important to increasing fleet capacity is its efforts at

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keeping the fleet operational; reducing vehicle, electrical or other system breakdowns; and assuring adequate operator/employee scheduling. Muni's efforts to address vehicle maintenance and availability are reflected in the Rehabilitation and Replacement Plan and its Equipment Maintenance Improvement Program. In fact, projected vehicle requirements in the rehabilitation/replacement program are reduced in response to planned maintenance improvements, which allow a reduction in the number of spare vehicles required for normal maintenance.

In addition there are those factors affecting service standards which Muni cannot be expected to solve totally. Another reason for temporary overcrowding is that patronage demand is not spread uniformly over a time period that Muni schedules can meet. That is, there is a "peak of the peak", on some lines of, for example, 30 minutes out of the two hour peak period, during which demand is most intensive. It is very expensive to provide sufficient peak service to accomodate demand surges of short duration. Thus, Muni assumed that future peak service will be based on meeting average peak demand, although Golden Gate Transit, for example, enjoys the luxury of scheduling service for peak of the peak demand. This factor accounts for continued overcrowding during a segment of the peak period.

Some portions of lines often are considerably more crowded than others, due to population density patterns. This has been particularly noticeable on the Muni Metro system where passenger loads within closer-in neighborhoods east of Twin Peaks often exceed even maximum standards, but diminish to more acceptable load standards west of the Castro station.

Finally, Muni does maintain some flexibility in street management and scheduling to move vehicles around to reduce overcrowding. Muni has instituted programs to improve street management (i.e., Transit Line Coordinator program) to reduce the "bunching" situation, where several overcrowded buses are followed by another not at capacity. Some degree of bunching also is caused by traffic patterns, however, which will undoubtedly continue. Muni's ability to schedule vehicles to reduce overcrowding is limited by the need to maintain adequate feeder service to/from major trunk lines, encourage the most cost effective route network overall, and maintain adequate headways on cross-town and neighborhood lines. Thus, it is often not acceptable, for example, to reduce a 1.7 load factor on one line by reducing service on a second line, even though the second line may have excess capacity.

Funding for Muni's Fleet Rehabilitation and Replacement Plan is based on the "committed" system, which includes the long-standing 1.5 maximum load factor service standard. Unfortunately, the Metropolitan Transportation Commission (MTC) defines "committed service" as that service which was provided by Muni in 1979. Then, as now, Muni's fleet size was inadequate to accomodate demand. Given current financial constraints, MTC and the U.S. Urban Mass Transportation Administration are not prepared to fund system expansion to a higher service level (lower load factors). Thus, Muni will be unable to reduce overcrowding through federal or regional assistance. However, in a separate proposal to the Mayor, Muni has examined what additional service would be required to reduce load factor levels to between 1.0 and 1.25 during the peak period on each line.

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Funding Muni Growth

The total cost of the vehicle rehabilitation/replacement program is estimated by Muni to be \$137,425,000 in 1982 dollars, or \$188,423,000 escalated at 9% per year through the decade. According to the plan, funds to carry out this program are expected from a variety of sources, including Section 5 and Section 3 Bus Capital from the federal government, state sources, local revenues, and the San Francisco Municipal Railway Improvement Corporation (SFMRIC), a non profit corporation established in 1971 for the purpose of selling bonds for transit improvements. The executive summary of the draft plan concludes that the plan "is practical, feasible, cost effective, and essential to ensuring the availability of reliable vehicles to meet ridership demand over the next ten years."

The capital requirements section of the plan considers two funding "scenarios". The "best case" assumes the most optimistic level of funding from each source, while the "worst case" assumes the most pessimistic. Using the inflated \$188 million dollar cost, the best case assumes that \$158 million will be forthcoming from the federal and state governments and \$35 million from the local source identified in the draft plan as "Assessment District/Development Fee"; in the worst case, Muni assumed \$77 million* from the federal and state governments, \$0 from the "Assessment District/Development Fee", and \$111 million from SFMRIC bonds or other local sources.

Clearly, as it now stands, federal funding is critical to funding the Muni Plan. Muni has been working with other transit operators and the federal government to ensure that the federal funds will be forthcoming, but at this time Muni believes, based on historical allocations and MTC projections, that the more pessimistic "worst case" federal/state funding level (\$77 million) is the more realistic one. Over the past five years, federal bus grants to Muni have totalled only \$2.02 million. MTC projects, based on current congressional allocation formulas, that Muni will receive about \$39 million in federal funds for rubber-tired vehicles over the next five years. Assuming a like projection over the 5-10 year period, MTC federal fund projections would be only \$1 million more than the Plan's worst case projection of \$77 million.

Because the Muni plan in a "worst case" situation indicates a potential funding shortfall from federal and state sources of as much as \$111 million, a variety of local funding sources are being sought.

SFMRIC has approximately \$30 million of cash on hand and \$30 million of bonds it can sell without a further vote of the people. Thus, total SFMRIC resources are about \$60 million. In the Rehabilitation and Replacement Plan, it is assumed that all of these resources would be used, if necessary, to purchase vehicles and construct supporting facilities, leaving a remaining shortfall of up to \$60 million.

A primary potential source of local funding for the Plan and its increased operational cost requirement is the development fee adopted by the Board of

*The \$77 million is uninflated over the full ten year period; inflation could add \$5 million additional, for a total of \$82 million, in relationship to the \$188 million inflated need.

MUNICIPAL RAILWAY
REHABILITATION AND REPLACEMENT PLAN
EQUIPMENT PLAN
FLEET INVENTORY CHANGES

	1982 Fleet	Retired	Rehab'd then Retired	Reserve Fleet	Purchase	1991 Fleet
Standard Diesels	528	(278)	(195)	(30)	220	245
Articulated Diesels	0				190	190
Standard Trolleys	345				0	345
Articulated Trolleys	0				90	90
LRVS	100				39	139
Cable Cars	40				11	51
PCC street cars	<u>78</u>	<u>(78)</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Total:	1,091	(356)	(195)	(30)	550	1,060
Seat capacity (not including PCC)	50,643					60,504

REHABILITATION AND REPLACEMENT PLAN
FUNDING PLAN
CAPITAL NEED

	<u>(81/82)</u>
1. Rehabilitation of 195 GMC coaches	\$10,625,000
2. Purchase of 190 articulated diesels	76,874,000
3. Purchase of 220 standard diesels	52,331,000
4. Purchase of 90 articulated trolleys	40,493,000
5. Assumed cost of facilities	<u>8,000,000</u>
Total	\$188,423,000*

*Inflated to Year of Acquisition

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REHABILITATION AND REPLACEMENT PLAN
FUNDING PLAN SOURCES OF FUNDS

		Ten Year Totals (\$000)	
		Best Case	Worst Case
1. UMTA Section 5 Tier IV		55,280	30,280
<ul style="list-style-type: none"> - May be used for bus purchase and/or rehabilitation and/or facilities - The allocation of funds is based on a formula which uses the weighted age of fleet as a basis. Rehabilitation reduces the weighted age and thus Muni's allocation. - In the best case, would enable purchase of 137 standard diesels over five years. Needs for bus purchases as determined in this plan exceed this limit. 			
2. UMTA Section 3, FAU, AB 1107, STA, Sale/Leaseback		97,376	46,820
<ul style="list-style-type: none"> - Rehabilitation with federal funds is limited to 20% of fleet, or 175 vehicles. The requirements of this plan exceed this limit. 			
3. UMTA New Bus Equipment (NBEI)		5,040	0
<ul style="list-style-type: none"> - May only be used for articulated trolleys 			
4. Assessment District/Development Fee		35,000	0
<ul style="list-style-type: none"> - From capital element of these sources 			
5. SFMRIC and Other Local Sources:			
<ul style="list-style-type: none"> - Any remaining capital need is met from this source. - In the best case, current SFMRIC reserves could meet this need through 85/86, at which point \$10 million in additional bonds would be required. - In the worst case, reserves last through 83/84. Additional bonds of \$123 million would be required through the ten year period. 			

Advances	(--)	121,323
Recoveries	--	(10,000)
Net	0	111,323

TOTAL:

\$188,423 \$188,423

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Supervisors, which is intended to be used for both capital and operating expenses caused by growth. As you know, the fee is being legally challenged, but the City Attorney has expressed confidence that the court will sustain the ordinance. In the meantime, the process has begun to collect the fee. Funds will be held in escrow pending the court's determination. The basis for calculating the fee is square footage of additional office space added in a defined "downtown" area. Early estimates indicate that over 11 million square feet of building area already is subject to the fee payment. After deduction of non-rentable and other space uses (such as retail), the City could receive as much as \$50 million upon conclusion of the court determination from this source. At an average rate of development of 1.5 million square feet per year (assuming 1.2 million is net additional office space), an additional \$40 million might be forthcoming from this source by 1991. While at this point estimates are not precise, this amount could meet the the local share of \$35 million projected by Muni in its current "best case" plan for funding the rehabilitation/ replacement program and provide a fund to accomodate the first years of increased operating expenditures.

Other potential local sources of capital also may be identified. Some \$55 million in funds including interest, are accumulating from the Business and Payroll tax increase enacted in 1980. I understand that as of today the court has upheld the legality of this tax. Muni could receive a share of these funds for use in funding the rehabilitation/replacement program and operating expenses. The extent to which Muni could draw on this source depends on other demands for these funds; increased demand for these funds is coming from reduced State funding and increased Medicare loads.

In her letter to the City Planning Commission of June 29, 1982, Mayor Feinstein noted that the traditional method for financing capital programs was to use federal grant monies matched by a local contribution raised through the sale of revenue bonds. The Mayor noted that her administration is working to assure that these federal capital grant monies continue. However, she concludes, "should that effort fail, I am fully prepared to recommend the use of our General Fund reserves to the extent necessary to achieve the necessary capacity increases." To that end, the Mayor has forwarded a draft Charter amendment to the Board of Supervisors that would allow use of General Fund monies for Muni capital needs. The Mayor has stated on more than one occasion that providing for the Muni's needs is the top priority for any general funds which become available.

While SFMRIC bonding capacity may be increased through a vote of the people, it must be used as a final resource because of its expensive interest implications. Based on the "worst case" projection in the Rehabilitation and Replacement Plan, financing of the deficit with SFMRIC bonds would increase Muni's annual SFMRIC lease payments from \$4 million annually to \$15 million annually.

As a first step in the use of General Fund monies for Muni capacity expansion, the Mayor has recommended that \$21 million from this year's surplus be earmarked for the capital costs of reducing Muni's load factor to a maximum of 1.25 on all lines during the peak period. These improvements are not reflected in Muni's Service Design Plan and Rehabilitation/Replacement program, but are called for in the separate proposal to the Mayor. To proceed

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in this manner, the City must ensure that the availability of local funds for this purpose is not used by regional/federal funding sources as a reason to reduce their commitment to Muni's capital needs. The \$21 million does not cover the operating costs of these additional vehicles.

With capital increases the operating expenses for Muni's fleet also continue to grow. Muni's draft Five Year Plan 1982-1987 projects operating expenses based on an earlier and somewhat larger demand projection, but not including the increment of growth in Muni Metro operating costs as a result of Service Design Plan improvements. Given these two factors, it offers a reasonable estimate of what expenses are likely to be. The draft budget grows from \$158 million (1982-83) to \$176 million (1983-84), with a projection of \$245 million (1986-87).

Muni's revenue projections to fund operating expenses (including all revenue sources: federal and state subventions, fare revenue, advertising, and General Fund) indicate that while revenues will match expenses for the current budget year (\$158 million in 1982-83), revenues expected in the 1983-84 budget year are \$166 million, or \$10 million less than projected expenses, and that revenues continue to fall short of expenses each succeeding year (\$32 million shortfall in 1986-87).

In making these projections, Muni has assumed that Muni's share of expected City revenues will remain constant. Thus, while adjusted General Fund support rose from \$44 million in 1980-81 to \$54 million in 1981-82 (an increase of \$10 million) and is expected to be \$65 million in 1982-83 (an increase of \$11 million), Muni's projections show General Fund support at \$70 million and \$75 million respectively for 1983-84 and 1984-85. As with the SFMRIC bond funds in the case of capital improvements, the General Fund is considered a final resource to be used to support the increasing operating cost shortfall only to the extent other sources cannot be used.

Other Measures for Accommodating Growth

As Working Paper I noted, accommodating growth can be achieved in ways other than capital system expansion. Key additional methods are increasing the number of occupants per automobile (carpooling), and, more directly related to Muni, increasing the use of flextime in order to spread the peak to times where service is now provided but underused. Moreover, there are other Transportation Systems Management (TSM) techniques, such as exclusive bus lanes, which if fully implemented and enforced, would allow Muni to give more service with the same amount of equipment and same number of operators. If there is a sufficient exclusive bus lane system with adequate enforcement, Muni vehicles, freed from congestion, can make more runs over the same routes during the same period of time. The Five Year Plan describes in detail Muni's intention of implementing TSM programs (including exclusive bus lanes and other transit preferential street improvements, as well as self-service fare collection, automatic vehicle monitoring, LRV trainlining and others). The Fleet Rehabilitation and Replacement Plan assumes a .5% annual growth in productivity due to these programs, which results in a similar rate of reduction in projected vehicle requirements. Based on the limited success of current TSM programs (e.g. Flextime and carpooling) an assumed annual productivity increase of .5% is generous. Muni encourages TSM techniques and

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will adjust future vehicle projections to reflect proven impacts on transit productivity.

How Other Transit Systems Will Accommodate Growth

Working Paper I indicates that some of the transit operators serving downtown San Francisco are better able than others to accommodate downtown growth. Additional demands are projected for each transit operator based on the current modal share of each. Demand is then compared with projected capacity for each operator, based on the Five-Year Plans and individual service level standards of each operator. (Unlike for Muni, no attempt yet has been made to determine additional demand on each operator caused by a shift in the modal split.) Using this analysis, all operators appear to accommodate the additional peak period person trips anticipated for 1990 except for A/C Transit. (By conscious regional policy, A/C Transit's transbay service is being shifted to BART, and all trips formally projected for A/C ridership are now anticipated to be carried by BART.) Analysis has not been completed as to the effects on the capacity of other systems that would be caused by modal shift, and it has not been possible to reexamine the funding assumptions used by each operator to determine what effect lack of projected funding would have on projected capacity.

BART's Five-Year Plan calls for extensive capital improvements designed to reduce headways, including redesign of the Daly City turnback and the Oakland wye, and purchase of 90 new "C" cars. BART currently has \$75 million allocated for the next five years from its reserve fund (construction funds and interest) and is expecting \$17 million from local sources over that period; BART also has applied for and is expecting substantial federal rail grant funds. By November 1986 BART expects p.m. peak capacity to grow from 12,168 to 20,779, and to be able to accommodate 9,711 more patrons above the present level in the peak hour and 20,200 more during the peak period.

SAMTRANS plans a net fleet expansion of 36 articulated buses over the next five years, to accommodate 2,700 more passengers above the existing level, by levying a quarter-cent sales tax this year, which eventually would be raised to a half-cent (a surplus would develop from the sales tax in the early years). Caltrans plans to upgrade Southern Pacific commuter rail service, with a net service expansion of 12 new bi-level cars, to be funded by local match money for an UMTA Section 3 grant.

Golden Gate Transit plans to purchase 87 buses over the next 5 years of which only 36 would be used for service expansion to San Francisco during peak periods. The estimated additional 55 inbound trips, corresponding to about 2,475 additional seats, would result in a net gain of approximately 1,845 seats after accounting for passengers displaced by reduced Larkspur ferry service; however, its Five-Year Plan states that expansion of ferry service also could occur if new diesel engines can be installed. Of the 87 buses proposed for purchase, only 15 now have funding committed.

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